

CITY AND COUNTY OF SAN FRANCISCO
DEPARTMENT OF CITY PLANNING

FINAL

84.533E

PAN MAGNA PLAZA

MIXED USE DEVELOPMENT

ENVIRONMENTAL IMPACT REPORT

STATE CLEARINGHOUSE # 86031123

PUBLICATION DATE: MARCH 14, 1986

PUBLIC HEARING DATE: MAY 1, 1986

PUBLIC COMMENT PERIOD: MARCH 14, 1986 TO MAY 7, 1986

FINAL EIR CERTIFICATION DATE: JUNE 4, 1987

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PAN MAGNA PLAZA
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I. SUMMARY

A. PROJECT DESCRIPTION

Four Seas Investment Corporation (Four Seas) proposes to construct two buildings on two separate sites: a 14-story office and residential structure (with ground-floor retail) at the intersection of Kearny and Jackson Streets ("A-Site"); and an eight-story office building (with ground-floor retail) at the intersection of Washington Street, Columbus Avenue and Montgomery Streets ("B-Site"). Both sites are located on the same block. The architect is Heller & Leake of San Francisco. The project sponsor's objectives are to provide high-quality office space at reasonable rental rates for small firms which desire to locate close to the financial district; to provide retail space to ease the demand in the crowded Chinatown community; to provide affordable housing to elderly Chinatown residents; and to achieve a reasonable return on investment capital.

The project sponsor proposes to construct 120 residential units, including 80 single units and 40 double units, to house 160 elderly or disabled people in the Manila-Chinatown community. The elderly housing would be developed with some financial assistance from the City and County of San Francisco. In order to maintain the units as "affordable housing" for fixed-income elderly people and disabled persons, the project sponsor would subsidize the housing units for 40 years.

The proposed project would be located on Lots 4, 5, 11 and 13 of Assessor's Block 195, in the City and County of San Francisco. Lots 11 and 13, located at the southeastern corner of the intersection of Kearny and Jackson Streets, constitute A-Site, and Lots 4 and 5, located at the northwestern corner of the intersection of Columbus Avenue and Washington and Montgomery Streets, constitute B-Site. The 18,920-sq.-ft. A-Site is currently vacant; the International Hotel (I-Hotel), which previously occupied Lot 13 of the site, was demolished in 1979. Lot 11 was previously occupied by a smaller

(approximately 30-unit) residential hotel (the Victory), also demolished in 1979. The 14,060-sq.-ft. B-Site is occupied by the two-story, 11,600-sq.-ft. Colombo Building, with ground-floor retail and office above, on Lot 4; Lot 5 is vacant. Lot 5 was previously occupied by a residential hotel (the Bell), with approximately 70 units, which was vacant for five years prior to its demolition in 1979. The Colombo Building would be demolished.

- Under the Chinatown Permanent Controls, A-Site is in the Chinatown Residential/Neighborhood Commercial (CR/NC) Use District; B-Site is in the Chinatown Community Business (CCB) Use District. The basic commercial Floor Area Ratios (FAR) in the CR/NC and CCB are 1.0:1 and 2.8:1, respectively. Section 124.1(a) of the Permanent Controls exempts developments (including the Pan Magna proposal) which have received commitment for Community Development Block Grant (CDBG) funds, as of January 10, 1985, for creation of new housing, from these FAR limits. The basic allowable FAR for the project (both sites) under the Permanent Controls is, as under the former zoning, 10.0:1 (in accordance with Section 124(c) of the Planning Code, since both sites are nearer to a C-3 District than to any R District). With through lot and corner lot premiums the allowable FAR for the sites is 12:01 (Section 125 of the Planning Code).
- Both A-Site and B-Site are in a 65-D-2 Height and Bulk District with a maximum permitted height of 65 ft.; height exceptions up to 200 ft. in the 65-D-2 District may be approved by the City Planning Commission in appropriate cases. Section 254 of the City Planning Code requires Conditional use (CU) authorization for height over 35 ft.

The building on A-Site would be two adjacent towers over a shared one-story base, with two levels of basement parking. The office tower with one mechanical level would be about 175 ft. tall (plus a penthouse which would be about 20 ft. tall at the highest point); the residential tower would be about about 75 ft. tall (plus a ten-ft.-tall penthouse). The building on A-Site would contain about 96,800 gross sq. ft. of office; about 12,100 gross sq. ft. of retail, 53,700 gross sq. ft. of residential (120 units, including 80 single units

and 40 double units), and about 37,800 gross sq. ft. of parking (108 valet or 54 independently accessible spaces) and two off-street loading spaces. The Floor Area Ratio (FAR) of the building, the ratio of building area to site size, would be about 9.7:1 (including retail and residential uses and accessory parking in excess of seven percent of the gross floor area of the building in the floor area calculation, but excluding mechanical and storage space and lobby area). The ground floor would contain retail space and two entry lobbies; one for the housing units, accessible from Jackson Street, and one for the office levels, accessible from Kearny Street. Parking and loading facilities, accessible from Jackson Street, would be located in the basements.

- The project would not meet the site coverage requirement for Mixed Use Districts under the Chinatown Permanent Controls (Section 134.1); the sponsor would apply for a variance from this requirement.

The building on B-Site would be about 100 ft. tall at its highest point (including a six-ft.-tall mechanical penthouse) and would contain about 81,300 gross sq. ft. of office, 9,500 gross sq. ft. of retail, and 14,060 gross sq. ft. of parking (31 valet or 15 independently accessible spaces). The FAR of the building would be about 7.0:1. In plan, the structure on B-Site would be roughly triangular. The building core would rise straight up from Columbus Avenue and Ils Lane on the northern corner of the site. The basement on B-Site would contain parking accessible from Washington Street. The ground floor would contain retail space, parking access and lobby area. Floors two through eight would be office floors. No off-street loading is proposed for B-Site.

The project (both sites) would require exception from bulk requirements (pursuant to Planning Code Section 271).

The entire project would contain about 178,100 gross sq. ft. of office, about 21,600 gross sq. ft. of retail, about 53,700 gross sq. ft. of housing (120 units including 80 single units, and 40 double units) and about 51,900 gross sq. ft. of parking (about 140 valet or about 70 independently accessible spaces). The total FAR of the project would be about 8.6:1.

In September of 1984, the Mayor, Four Seas and the Citizen's Advisory Committee for Development of the I-Hotel Block signed a "Memorandum of Understanding," whereby Four Seas proposed a project with two 12-story office buildings and 140 residential units

for the elderly, to which the Mayor agreed to commit \$1.5 million of CDBG funding. This project is proposed by Four Seas in response to that Memorandum.

The project sponsor expects project review and design to be completed during the second half of 1986. Construction would take about 22 months. Project occupancy is expected to begin in early 1988. The estimated construction cost of the project is about \$24.5 million (1984 dollars). Office space is expected to rent for about \$26 to \$32 per sq. ft. per year. Retail space is expected to rent for about \$28 to \$36 per sq. ft. per year. Housing units are expected to rent (per month) for about \$310 (single units) and \$360 (double units).

B. MAIN ENVIRONMENTAL EFFECTS

LAND USE AND ZONING

Land use changes resulting from the project would be intensified office and retail space, and re-introduction of residential uses on the project block. The two mid-rise structures proposed for the project would continue the increased scale of office and retail uses of the Financial District across Washington Street, which serves as the northern boundary of the C-3 district.

The project would include construction of a 14-story building on A-Site and an eight-story building on B-Site. The Colombo Building, which contains about 5,800 gross sq. ft. of office space and about 5,800 gross sq. ft. of retail space, would be demolished. The project would add new office space, new retail space, residential space, and basement parking to the project sites.

The project would not change the mix of uses, but could affect the scale and character of the surrounding neighborhoods. The number of workers employed at the sites would increase with the project; development of A-Site would re-introduce a residential population. Pedestrian activity at the site would increase due to persons (tenants and non-tenants) patronizing retail establishments, and going to or from their place of employment or residence (A-Site residential tenants).

The project could cause indirect growth-inducing effects on nearby land uses. The two sites are in an area where the City has adopted interim controls and is studying permanent

zoning controls. The interim C-2-C (Chinatown Community Business) controls require CU authorization for heights above 40 ft. This requirement would apply to the project.

- The permitted FAR for both sites is about 12:1. The FAR on A-Site would be about 9.7:1 and the FAR on B-Site would be about 7.0:1. The project would be exempt from the CR/NC District FAR of 1.0:1 for A-Site and CCB District FAR of 2.8:1 for B-Site due to the creation of low-income housing which will be partially financed by Community Development Block Grant funds (pursuant to the Permanent Controls, Section 124.1(a)).
- The project would exceed the height limit of 65 ft. in the 65-D-2 District and request Conditional Use approval. Heights up to 200 ft. in the 65-D-2 District may be permitted (Section 263.1 of the City Planning Code). CU authorization would be necessary for building height exceeding 35 ft. Both project buildings would require exception from bulk restrictions.

The project sites are located in the Washington/Broadway Special Use District No. 1 and are required to provide parking for dwelling units only. Twenty-four parking spaces would be required for A-Site; 108 valet parking spaces (or 54 independently accessible spaces) are proposed on A-Site; 31 valet parking spaces (or 15 independently accessible spaces) are proposed on B-Site. CU authorization would be necessary for about 75 valet parking spaces. One loading dock would be required on A-Site; two loading docks are proposed. No off-street loading is proposed on B-Site.

URBAN DESIGN

Construction of a 14-story structure on the vacant A-Site, demolition of the two-story Colombo Building, and construction of an eight-story structure on B-Site, would alter the scale, facade rhythm, and urban texture of the project block and its vicinity. The project would represent a departure in form and scale from the existing development on the project block; it would be similar to newer high-rise and mid-rise structures. The

- proposed office tower on A-Site would be about three to six times the height of prevailing development on the project block and, in general, throughout the North Beach, Chinatown and Jackson Square districts. The project would step down in height from the Financial District.

The project would include a number of design features intended by the project architects to minimize the perceived height and bulk of the two structures. Setbacks would reduce apparent height and relate the facade at the property line more closely to the heights of adjoining buildings. The structure on B-Site would be set back at the fourth, sixth, seventh and eighth levels. The structure on A-Site would include chamfered building corners capped by a dome, thereby reducing the apparent bulk of the building.

The project would be visible from medium- and long-range view points to the north and west. From Telegraph Hill and Nob Hill, the project would be visible as part of a group of existing and under-construction high-rise structures of the Financial District. In some short- and mid-range views, the two project structures would alter the small-scale character of the area.

SHADOW AND WIND

Due to the recent build-up of the project vicinity, the proposed project would cast little new shadow during all times of the day and year. The project is designed to cast no new shadow on any property under the jurisdiction of the Recreation and Park Department and would thus not be in conflict with Proposition K, the Shadow Ban Ordinance.

The project would cause winds to decrease at 12 of the 21 locations measured in the wind tunnel, including all where existing winds exceed 10 mph. It would cause winds to increase at five locations. Winds would exceed 11 mph at three locations, where the existing winds already exceed 11 mph.

HISTORICAL/ARCHITECTURAL AND CULTURAL RESOURCES

Construction on B-Site would require the demolition of the Columbo Building, which was rated "3" in the 1976 Department of City Planning Architectural Inventory, and was recommended for San Francisco City Landmark Status in May, 1984. The building was surveyed by Heritage and given a rating of B*.

An archaeological investigation conducted for the sites suggests the potential presence of significant cultural resources on both A- and B-Sites from the Spanish-Mexican to Gold Rush periods. The most likely discovery on the project site would be artifacts from the Gold Rush period; there is also evidence that aboriginal remains may exist.

TRANSPORTATION, CIRCULATION AND PARKING

Sidewalk detours and curb lane closures on the Jackson Street, Kearny Street, Washington Street and Columbus Avenue frontages would be necessary during project construction. The bus stops on Kearny Street and Columbus Avenue in front of the project sites would require temporary relocation during construction of the project. Demolition would generate 10 truck round trips per day. Project construction would generate an average of 10 truck round trips per day; excavation would generate 45 truck round trips per day. Construction truck traffic would be limited to the period between 9:00 a.m. and 3:30 p.m.

The project would generate about 6,450 net new person trips per day. About 880 new outbound trips would occur during the p.m. peak period, 530 of these during the p.m. peak hour.

The project would provide a total of 139 valet parking spaces (or 69 independently accessible spaces), 108 valet (or 54 independently accessible) spaces on A-Site and 31 valet (or 15 independently accessible) spaces on B-Site. Estimated equivalent daily parking demand from the project would be about 180 spaces, resulting in an unmet demand of about 40 spaces (assuming valet parking).

The proposed project would generate about 270 new pedestrian trips on the adjacent sidewalks during the noon 15-minute peak period and about 190 new pedestrian trips during the p.m. 15-minute peak period. Sidewalk operations, currently in the open, unimpeded and impeded ranges at locations adjacent to the project site during both the noon hour and p.m. peak hour, would remain in those ranges with the addition of anticipated pedestrian trips from the project.

The project would add about 160 outbound trips to Muni, 125 trips to BART, and 80 outbound trips to other transit agencies during the p.m. peak period in the year 2000. The project would generate an annual cost deficit to Muni of about \$41,600. The project would result in an annual net operating deficit to BART of about \$166,400. BART's operating deficit per passenger is likely to decline in real terms as planned service improvements become operational in the future.

The transit demand from the project would represent about 0.2% of the total transit demand in the year 2000. Cumulative development under the Downtown Plan to the year

2000 in conjunction with planned capacity increases of transit carriers would be expected to cause the following changes in transit levels of service during the peak period: Muni Northeast Corridor - D to C, BART Transbay - F to E, A-C Transit - C to D, Golden Gate Ferry - B to A, Tiburon Ferry - B to C, and CalTrain - B to C.

- The project would generate about 125 vehicle trip ends during the p.m. peak period, about 80 of these would occur during the p.m. peak hour.

With cumulative development by the year 2000, sidewalk and crosswalk operations would be in the open, unimpeded and impeded range for all locations studied.

Cumulative development, including that from the proposed project, by the year 2000 would be expected to further exacerbate the existing peak-hour traffic Level of Service (LOS) conditions at local intersections. With cumulative development, conditions at the intersection of Clay and Battery Streets would worsen from LOS C to LOS D, and conditions at the Broadway/Sansome intersection would worsen from LOS C to LOS D.

About 0.2% of year 2000 Bay Bridge peak-period demand would be due to the project. The project also would represent about 0.2% of peak-period demand on the Golden Gate Bridge, 0.2% on US 101 (south of Harney Way), and 0.1% on I-280 (between Alemany Boulevard and San Jose Avenue).

The C-3 District would generate demand for approximately 58,000 equivalent daily parking spaces in the year 2000 under the Downtown Plan, an increase of 28% from 1984. Short-term demand would continue to represent about 25% of the total demand. The project parking demand would be equivalent to less than one percent of the total demand from the C-3 District. The parking supply has been assumed to be about 51,000 spaces. Alternatively, if the goals of the Downtown Plan are achieved, total parking demand in the year 2000 would increase by about six percent over 1984 and there would not be a parking deficit.

AIR QUALITY

Project-related vehicular traffic would add to cumulative regional pollutant emissions. Project construction would result in emissions of total suspended particulates (TSP); TSP generated by the project and cumulative development would increase TSP concentrations, which could increase the frequency of TSP standard violations in San Francisco.

Currently, the eight-hour CO standard is estimated to be exceeded at the Battery/Clay and Broadway/Sansome intersections. The CO concentrations are predicted to be less in 2000 than in 1984, and would not violate the standards at these intersections.

EMPLOYMENT AND HOUSING

At full operation, the project would accommodate approximately 750 permanent full-time jobs for office, retail and janitorial/service functions. The 35 employees currently on B-Site would be displaced. Secondary employment and income would result from permanent project employment; through the multiplier effect. The total number of Bay Area jobs that would be supported by growth in downtown employment due to the project would be about 2,250 (720 net project jobs plus 1,530 jobs from the multiplier effect). Project construction would require about 130 person-years of labor, an average of about 60 to 65 construction jobs over a 22-month construction period, with about 115 additional person years of employment as a result of the multiplier effect of project construction.

The mixed use nature of the project results from many years of negotiation among the project sponsor, city agencies, and the I-Hotel Block Citizens Advisory Committee over the disposition of the site, which formerly contained the International Hotel (I-Hotel). The I-Hotel was a low-cost, long-term residential hotel occupying the northern lot of the project's A-Site. Tenants were evicted from the 164-unit hotel on August 4, 1977; the I-Hotel was later demolished in 1979.

The project would attract out-of-area employees and, therefore, it would also contribute to increased local housing demand. According to the Office of Affordable Housing Production Program formulae, the project could create a net demand for about 67 housing units in San Francisco. The project sponsor intends to meet this requirement through the 120 housing units proposed as part of the project, which would be available to elderly citizens for forty years.

The project has been allocated \$1.5 million from the 1985 federal Community Development Block Grant (CDBG) program to assist the construction of affordable residential units. The project would provide low-cost housing for 160 persons, thereby helping to offset the great demand for such housing in Chinatown and Manilatown.

The project would provide 120 low- to moderate-income senior citizen housing units for 160 people, where up to 265 units previously existed in three residential hotels.

GROWTH INDUCEMENT

If marketed successfully, the project could have growth-inducing effects in and around North Beach and Chinatown by demonstrating a market for office space in this area. It is expected that some employees in the project would want to live in San Francisco. Employment growth, however, would not be reflected directly to increases in demand for housing and city services to residents, as some new jobs would be held by individuals who already live and work in the City.

C. MITIGATION MEASURES

Major mitigation measures included in the proposed project are listed below.

- The sponsor would retain the services of an archaeologist. The Environmental Review Office (ERO) in consultation with the President of the Landmarks Preservation Advisory Board (LPAB) and the archaeologist would determine whether the archaeologist should instruct all excavation and foundation crews on the project site of the potential for discovery of cultural and historic artifacts, and the procedures to be followed if such artifacts are uncovered.
- During the construction period, construction truck movement would be permitted only between 9:00 a.m. and 3:30 p.m. to minimize peak-hour traffic conflicts.
- The project sponsor would require the project contractor to muffle and shield intakes and exhaust and use electric-powered, rather than diesel-powered, construction equipment, as feasible, so that noise would not exceed limits stated in the City's Noise Ordinance (Article 29, San Francisco Administrative Code, 1972).
- Should Ordinance 224-81, which requires the sponsor to contribute funds for maintaining and augmenting transportation service in an amount proportional to the demand created by the project, be declared invalid by the courts, the project

sponsor has agreed to participate in any subsequent equivalent mitigation measures adopted in-lieu thereof that are equitable and legal, which the City adopts to apply to all developments which are similarly situated.

- San Francisco Ordinance 358-85 requires the sponsor to participate in the City's Office Affordable Housing Production Program (OAHPP). This program is designed to mitigate the project's contribution to the housing market impacts of San Francisco office development. The OAHPP requires that the project sponsor construct housing or pay a fee to the City to subsidize housing development. Based on the OAHPP formulae in the City's Ordinance, the requirement for this project would be the payment of \$920,082 or the development of 67 housing units. The project sponsor intends to meet this requirement through the 120 subsidized senior housing units proposed as part of the project.

D. ALTERNATIVES

NO PROJECT

This alternative would entail no physical change to the site as it now exists. In general, the environmental characteristics of this alternative would remain as described in the setting section of this report. Levels of traffic, air pollution, and shadow now attributable to the Columbo Building on B-Site would continue as at present. A-Site and part of B-Site would remain vacant. Winds in the area would remain as at present. No height reclassification of A-Site would be necessary.

The project sponsor has rejected this alternative because none of the development objectives would be met.

CODE CONFORMING (WITH CU) ALTERNATIVE

This alternative would conform to Planning Code height and bulk requirements with Conditional Use (CU) authorization for height above 65 ft. on B-Site. B-Site is in the 65-D-2 height and bulk district where heights of up to 200 ft. are permissible with CU authorization. However, in accordance with interim zoning, heights above 40 ft. in Chinatown must receive CU authorization.

This alternative would not require a height reclassification. It would require CU authorization for heights above 40 ft. (both sites), and if the interim zoning were to lapse, would require CU authorization for height above 65 ft. on B-Site.

The building on B-Site would be set back above the third and seventh levels, rising to a height of about 90 ft. at the top of the eighth level; the building on A-Site would consist of two 65-ft. portions separated by a 40-ft. tall center portion. Approximately 94,000 gross square feet of office, 21,600 gross square feet of retail and 30,950 gross square feet of residential space (85 units) and 33,650 gross square feet of parking (85 spaces) would be included in this alternative. Due to the reduction in office space of this alternative compared to the project, transportation, air quality, housing demand, and other impacts would be proportionately reduced. Winds would be reduced compared to existing conditions but not as much as with the project.

The project sponsor has rejected this alternative, because he considers that it would be an economic underuse of A-Site, and would not provide as many housing units.

PRESERVATION ALTERNATIVE

This alternative would result in the preservation of the Colombo building on B-Site. One additional story, covering 75% of the building footprint would be added to the Colombo Building. A new eight-story structure would be constructed on the now-vacant Lot 5, west of the Colombo Building. The structure on A-Site would have a 16-story, 200-ft. office tower on the southern half of the site adjacent to the 87-ft-tall, 9-story residential tower.

As for the project, a height reclassification for about two thirds of A-Site would be necessary from the existing 65-A, to 65-D-2. In accord with the Chinatown Interim Controls, CU authorization would be necessary for both project buildings to exceed 40 feet in height. Should the Interim Controls lapse, CU authorization would be necessary for project buildings to exceed 65 ft.

Approximately 193,600 gross square feet of office, 21,600 gross square feet of retail, 53,700 gross square feet of residential space (120 units as for the proposed project)

and 51,900 gross square feet of parking (108 valet spaces on A-Site and 31 valet spaces on B-Site) would be included in his alternative (as for the project).

Transportation, air quality, housing demand, and other impacts of the alternative would be similar to those of the project, given the similar allocations of office space. The eight-story structure on B-Site would cast new shadow on Portsmouth Square one hour after sunrise on June mornings in violation of Proposition K. Winds would be reduced compared to the existing conditions.

This alternative was rejected by the project sponsor because he considers that it would be an underuse of B-Site.

40-FOOT-TALL CODE CONFORMING ALTERNATIVE (NO CU)

This alternative would consist of two structures, both 40 ft. tall, on A and B-Sites. No height reclassification would be necessary and no CU authorization would be required, either under underlying or interim zoning.

The design would result in no new shadow on Portsmouth Square during the hours regulated by Proposition K.

The Colombo Building would be demolished; the new structure on B-Site would be three stories tall with 27,720 square feet of office and 9,460 square feet of retail. The structure on A-Site would also be three stories tall and would contain about 34,340 square feet of office and about 12,150 square feet of retail. As proposed under the Code Conforming (with CU) Alternative, 54 valet parking spaces would be available on A-Site and 31 valet spaces would be available on B-Site. There would be no housing units under this alternative. Due to the reduction in office space of this alternative compared to the project, transportation, air quality, housing demand, and other impacts would be reduced.

This alternative was rejected by the project sponsor because he considers that it would be an economic underuse of both sites, and would not meet the development objectives.

INCREASED HOUSING ALTERNATIVE

Under this alternative, the building on A-Site would have no office space, but would consist of two 75-ft.-tall residential towers (they would thus not be "high-rise" housing) with a total of about 240 residential units. The building on A-Site would have ground floor retail uses, as with the project. The structure on B-Site would be as under Alternative B - Code Conforming (with CU).

This alternative would require a height reclassification for a portion of A-Site from the 65-A district to the 65-D-2 Height and Bulk District. It would require CU authorization for heights above 40 ft. (both sites), and should the Chinatown Interim Controls expire, this alternative would require CU authorization for height above 65 ft.

This alternative would not result in new shadow on Portsmouth Square during the hours regulated by Proposition K.

This alternative would include a total of 65,700 sq. ft. of office (all on B-Site), about 21,600 sq. ft. of retail, about 107,400 sq. ft. of residential and about 33,650 sq. ft. of parking (85 valet spaces).

Due to the reduction in office space of this alternative, compared to the project, transportation, air quality, housing demand, and other impacts would be proportionately reduced. This alternative would provide housing for 160 more elderly or disabled persons than the project.

The project sponsor has rejected this alternative because he considers that it would be economically infeasible.

- CHINATOWN RESOURCE CENTER AND ASIAN NEIGHBORHOOD DESIGN ALTERNATIVE

Alternative F would consist of three buildings, two of which would share a common base on A-Site. The building on B-Site would be the same as with the proposed project. The configuration of the building on A-Site would be similar to Alternative E. A-Site would

consist of two 85 ft.-tall towers. The tower at the corner of Kearny and Jackson Streets, would contain 57,300 sq. ft. of office space over retail space and the other tower, directly behind the office tower, would contain 53,700 sq. ft. of residential space (120 units as for with project). The residential structure would also contain retail space, community and lobby space . Alternative F would have about 20% less office space than the DEIR project; 18,600 sq. ft. of retail space, 5,500 sq. ft. lobby and 6,000 sq. ft. of mechanical space as compared to 21,600 sq. ft. retail, 5,500 sq. ft. lobby and 8,900 sq. ft. mechanical as with the proposed project.

Because of the reduction in office space of this alternative compared to the project, transportation, air quality, housing demand, and other impacts would be proportionately reduced. Wind impacts would be similar to those of the proposed project.

The project sponsor has rejected this alternative as he considers that it would be less aesthetically attractive than the project or Alternative G.

● REDUCED OFFICE SPACE ALTERNATIVE

Under this alternative the building on B-Site would be the same as with the proposed project (81,300 sq. ft of office, 9,500 sq. ft. of retail and 31 parking spaces). The building on A-Site would be 11-stories tall (northern portion) along Jackson Street and would step down to three-stories tall (southern portion) south of Jackson Street along Kearny Street. The building would have three levels of basement parking accessible from Jackson Street. The first two floors of the structure would have retail space with restaurant space on the third floor. An atrium courtyard would be located in the center of the southern portion of the building with a rooftop garden and terrace atop of the third floor. Seven floors of residential units and a community services floor (fourth) would be located in the northern portion of the building.

Under this alternative, A-Site would include 126 residential units (51,900 sq. ft.), a total of 43,300 sq ft. of commercial space (19,300 sq. ft. retail and 24,000 sq. ft. restaurant space) and 155 self-service parking spaces. Residential space would include 35 double units at 325 sq. ft. each and 91 single units at 250-300 sq. ft. each. Alternative G would also include 6,600 sq. ft. of community space and one loading dock. The height of the

residential or northern portion of the building would be about 130 ft. with a 10 ft.-tall mechanical penthouse atop; the southern portion would be about 45 ft.-tall not including the mechanical penthouse. Neither portion of the building would include setbacks.

Under Chinatown Permanent Controls, this alternative would be required to provide about 4,022 sq. ft. of common usable of open space for residential uses. Alternative G would be required to provide 2,682 sq. ft. of open space for commercial uses. Open space requirements would be met with the rooftop garden and, terrace (9,400 sq. ft.). The rooftop garden and terrace would also meet the projects site coverage requirement.

Alternative G would require the same approvals to those necessary for the project, with the exception of the variance from Section 134.1 Site Coverage requirements.

The impacts for B-Site of this alternative would be about the same as, or less than, those with the proposed project. The northern portion of the A-Site structure would be about 55 ft. taller than the proposed project at Jackson and Kearny Streets and about 150 ft. shorter at the southern portion along Kearny Street, not including mechanical penthouses.

Neither the northern or southern portion of the structure on A-Site would include any setbacks; due to its overall reduced heights, it would be less prominent than the project in mid- and long-range views from the north and west. From Telegraph and Nob Hills, this alternative would be visible as would the proposed project.

Shadow effects from B-Site would be the same as with the project. The configuration of shadows from A-Site would be different from the project because the taller portion of the structure would be at the corner of Kearny and Jackson Streets whereas for the project, the taller portion of the structure would be at the southern portion of the site. Generally shadows from A-Site under Alternative G would be shorter than with the project, because of the reduced overall height.

Using the Downtown Plan EIR analysis this alternative would generate about 9,270 net new daily pte; about 44% more than with the project. This alternative would generate more trips than the project because of its increased amount of retail space. Using the

Downtown Plan EIR analysis peak period pte with this alternative would be about 975 with 590 occurring during the peak hour, representing about 11% more than with the project. Impacts on traffic and transit would be proportionately more. With this alternative, using the Downtown Plan EIR analysis Levels of Service at the six intersections analyzed would be the same as with the project.

Using the Chinatown modal splits, daily trips would be less than one percent more than the numbers generated by the project using the same analysis, and peak hour trips would be about 16% and 24% less than with the project. Travel from Alternative G would be distributed more uniformly throughout the day than with the project because of the increased retail space. Impacts on traffic and transit would be proportionately less than the project analyzed with the Chinatown modal splits.

This alternative would create a net new demand for about 95 long term spaces and net new demand for 40 short term spaces for a total daily demand of 135 equivalent daily spaces. This alternative would provide 186 cars, a surplus of 51 spaces as compared to the deficit of 40 spaces that the project would create.

Air quality, energy and noise effects associated with on-site uses would be about the same as with the project. Cultural resource effects associated with construction of this alternative could be greater than with the project as this alternative would include four basement levels on A-Site compared with two for the project.

Alternative G is the project sponsor's preferred alternative as it would meet his objectives for the site and respond to concerns raised about the project.

II. PROJECT DESCRIPTION

A. PROJECT SPONSOR'S OBJECTIVES

Four Seas Investment Corporation (Four Seas) proposes to construct two buildings on two separate sites: a 14-story office and residential structure (with ground floor retail) at the intersection of Kearny and Jackson Streets ("A-Site"); and an eight-story office building (with ground floor retail) at the intersection of Washington Street, Columbus Avenue and Montgomery Streets ("B-Site"). Both sites are located on the same block. The architect is Heller & Leake of San Francisco. The project sponsor's objectives are to provide high-quality office space for small firms which desire to locate close to the financial district; to provide retail space and to provide affordable housing to elderly Chinatown residents; and to achieve a reasonable return on investment capital.

The project sponsor proposes to construct 120 residential units (including 80 single units and 40 double units) to house 160 elderly or disabled people in the Manila - Chinatown community. The elderly housing would be developed with some financial assistance from the City and County of San Francisco. In order to maintain the units as "affordable housing" for fixed-income elderly people and disabled persons, the project sponsor would subsidize the housing units for 40 years.

B. PROJECT LOCATION

The proposed project would be located on Lots 4, 5, 11 and 13 of Assessor's Block 195, in the City and County of San Francisco. Lots 11 and 13, located at the southeastern corner of the intersection of Kearny and Jackson Streets, constitute A-Site, and Lots 4 and 5, located at the northwestern corner of the intersection of Columbus Avenue and Washington and Montgomery Streets, constitute B-Site. Assessor's Block 195 is rectangular, divided into two unequal roughly triangular portions by Columbus Avenue. The project sites are both west of Columbus Avenue, A-Site is at the northern ("cut-off") corner of the western triangle, fronting on Kearny and Jackson Streets, and B-Site is at the southeastern corner of the western triangle, fronting on Washington Street and Columbus Avenue (see Figure 1, p. 16).

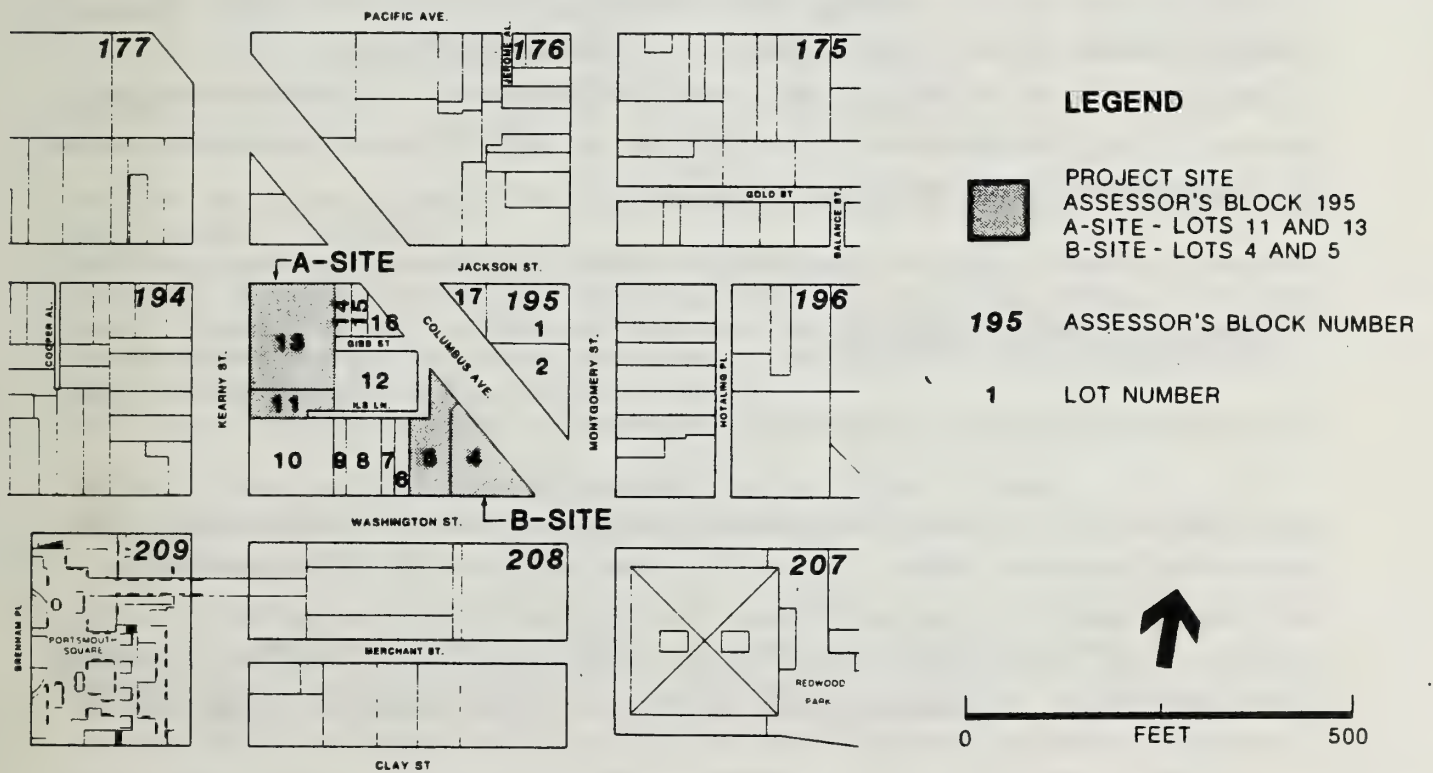
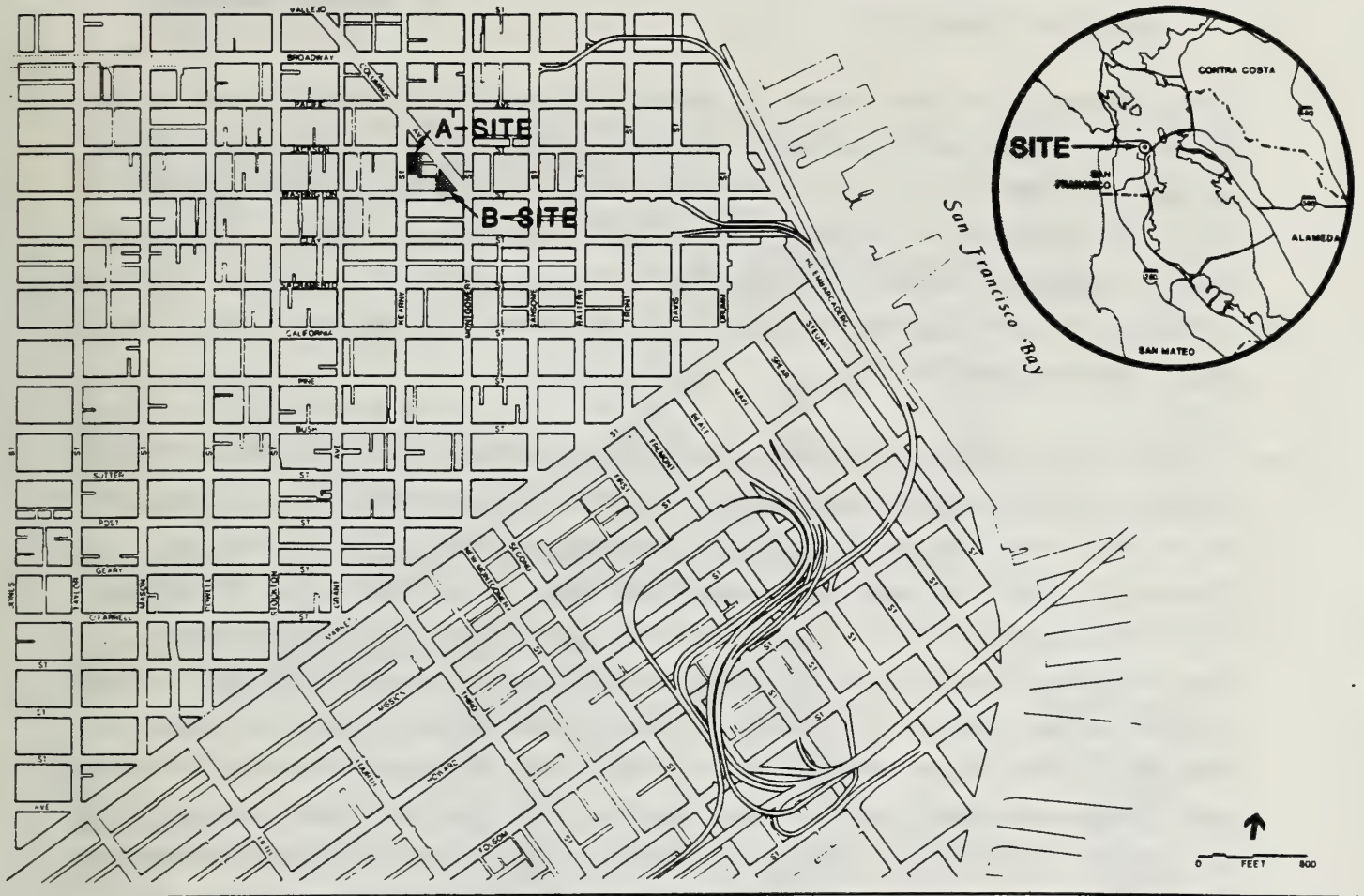


FIGURE 1
PROJECT LOCATION

SOURCE: ESA

The 18,920-sq.-ft. A-Site is currently vacant; the International Hotel (I-Hotel), which previously occupied Lot 13 of the site, was demolished in 1979. Lot 11 was previously occupied by a smaller (30-unit) residential hotel (the Victory Hotel), also demolished in 1979. The 14,060-sq.-ft. B-Site is occupied by the two-story, 11,600-sq.-ft. Colombo Building, with ground-floor retail and office above, on Lot 4; Lot 5 is vacant. Lot 5 was previously occupied by a residential hotel (the Bell Hotel), with approximately 70 units, which was demolished in 1979.

- A-Site is in the Chinatown Residential/Neighborhood Commercial (CR/NC) Use District; B-Site is in the Chinatown Community business (CCB) (CR/NC) Use District, both of which were adopted by the City Planning Commission as Permanent Controls on February 19, 1987. The basic commercial Floor Area Ratios (FAR) in the CR/NC and CCB Districts are 1.0:1 and 2.8:1, respectively. Section 124.1(a) of the Permanent Controls exempts developments (including the Pan Magna proposal) which have received commitment for Community Development Block Grant (CDBG) funds, as of January 10, 1985, for creation of new housing, from this FAR limit. The basic allowable FAR for the project (both sites) under the Permanent Controls is, as under the former zoning, 10.0:1 (in accordance with Section 124(a) of the Planning Code, since both sites are nearer to a C-3 District than to any R District). With through lot and corner lot premiums the allowable FAR for the sites is 12.0:1 (Section 125 of the City Planning Code). Both A-Site and B-Site are in a 65-D-2 Height and Bulk District with a maximum permitted height of 65 ft.; height exceptions up to 200 ft. in the 65-D-2 District may be approved by the City Planning Commission in appropriate cases.

C. PROJECT CHARACTERISTICS

Project characteristics are summarized in Table 1.

The building on A-Site would be two adjacent towers over a shared one-story base, with two levels of basement parking. The two basements would contain parking and loading facilities, accessible from Jackson Street. The first level of the structure would contain retail uses. The southern tower would contain twelve floors of office (and one mechanical level) over the base. The northern tower would contain seven stories of housing over the

TABLE 1: PROJECT CHARACTERISTICS

		Height and Bulk			
		Proposed		Permitted	
		A-Site	B-Site	A-Site	B-Site
Maximum Height		165 /a/	94 /a/	65 /b/	65-200 /b/
Maximum Length (above 40 ft.)		175	179	110	110
Maximum Diagonal (above 40 ft.)		207	195	125	140
Basic FAR		9.7:1	7.0:1	12:1 /c/	12:1 /c/
SITE SIZES (Total)	A-Site: 18,920 sf 32,980 sf)		B-Site: 14,060 sf		
PROPOSED FLOOR AREA (gross sq. ft.)			65F		
		<u>A-Site</u>	<u>B-Site</u>		<u>Total Project</u>
Office		96,800	81,300		178,100
Retail		12,100	9,500		21,600
Residential		53,700	--		53,700
Mechanical & Storage		6,300	2,600		8,900
Lobby		3,000	2,500		5,500
Parking (valet)		37,840	14,060		51,900
		<u>(108 spaces)</u>	<u>(31 spaces)</u>		<u>(139 spaces)</u>
TOTAL		209,740	109,960	95,900 w/o pkg	319,700

/a/ Does not include mechanical level or penthouses (an additional 30 ft. on A-Site and an additional six ft. on B-Site.)

/b/ The proposed project includes a Height and Bulk reclassification of A-Site from 65-A to 65-D-2. Height exceptions on B-Site (which is in a 65-D-2 Height and Bulk District) may be approved by the City Planning Commission up to a height of 200 ft. In any event, the Chinatown Interim Controls call for all structures over 40 ft. to be permitted only upon approval by the City Planning Commission.

/c/ Includes corner and through lot bonuses.

SOURCE: Environmental Science Associates, Inc., and Heller & Leake

base. Each tower would have a mechanical penthouse. On the office tower the mechanical level would be topped with a dome. The office portion of the building would be about 165 ft. tall, not including the 14th mechanical level and mechanical penthouse dome, which together would be about 30 ft. tall to the highest point. The residential portion would be about 75 ft. tall, not including the mechanical penthouse, which would be

about ten ft. tall at its highest point. The floor-to-floor height in the residential portion would be about nine ft., and in the office portion about 12.5 ft.

- Under the Chinatown Permanent Controls, the permitted dwelling unit density for the project site is one unit for each 200 sq. ft. of lot area (City Planning Code Section 207.5). Thus, 94 units would be permitted on A-Site. The Planning Code allows twice this density for dwellings specifically designed for, and occupied by, senior citizens or physically handicapped persons, so long as the units are limited to such occupancy for the actual life of the project (Section 209.1(m)). Thus, the 120 units proposed would be fewer than the 188 permitted. Occupancy of units within the project would be restricted to senior citizens and physically handicapped persons./1/
- The project would not meet the site coverage requirement for Mixed Use Districts under the Chinatown Permanent Controls (Section 134.1); the sponsor would apply for a variance for this requirement.

The building on A-Site would contain about 96,800 gross sq. ft. of office; about 12,100 gross sq. ft. of retail, about 53,700 gross sq. ft. of residential (120 units: 80 single units and 40 double units, housing 160 elderly or disabled residents), and about 37,800 gross sq. ft. of parking (108 valet or 54 independently accessible spaces); there would be two off-street truck loading spaces in the first garage level of A-Site with sufficient maneuvering area for an additional two trucks queuing. There would be also sufficient stacking space for 25 automobiles. The Floor Area Ratio (FAR) of the building, the ratio of building area to site size, would be about 9.7:1 (including residential uses and accessory parking in excess of seven percent of the total building area in the floor area

- calculation but excluding mechanical and storage space and lobby area). The FAR on A-Site would be below the maximum permitted for the project (12.0:1); it would be above the allowable commercial FARs of 1.0:1 for A-Site and 2.8:1 for B-Site contained in the Chinatown Permanent Controls, which exempt developments like the project from the FAR requirements because of the commitment of CDBG funds for housing. (Under the Permanent Controls, residential uses do not count against the FAR of a building; without including residential area, the FAR of A-Site would be about 7.1:1).

- The Chinatown Permanent Controls require 48 sq. ft. of private open space per dwelling unit (5,760 sq. ft. for the project) which may be substituted by common usable open space in a ratio of 1.33:1 (7,661 sq. ft. for the project). For dwelling units specifically designed for and occupied by senior citizens, the minimum amount of usable open space which can be provided is one-half the amount required or 3,830 sq. ft. of common usable open space for residential uses in the project. The Chinatown Permanent Controls also require one sq. ft. of open space for each 50 sq. ft. of commercial space, or 3,994 sq. ft. for the project (both sides). The project would provide 4,270 sq. ft. of open space on the roof of the residential tower, and 2,500 sq. ft. in a courtyard in the rear of the buildings. The project would also incorporate a walk-through arcade from Kearny Street through to Gibb Street (which would be improved). The additional open space requirement of approximately 1,055 sq. ft. would be met by improvement of off-site open space and/or the payment of an in-lieu fee.

The eight-story residential tower would not include any setback. The office tower would include chamfering of building corners. The office tower would be capped with a dome.

The proposed structure on B-Site would be about 94 ft. tall plus a six-ft.-tall mechanical penthouse. In plan, the structure on B-Site would be roughly triangular (as is the existing Colombo Building). The building core would rise straight up from Columbus Avenue and IIs Lane on the northern corner of the site.

- The building on B-Site would contain about 81,300 gross sq. ft. of office, 9,500 gross sq. ft. of retail, and 14,060 gross sq. ft. of parking (31 valet or 15 independently accessible spaces). The FAR of the building on B-Site would be about 7.0:1 (below the maximum of 12.0:1 permitted for the project but above the allowable FAR of 2.8:1 contained in the Chinatown Permanent controls).

The basement on B-Site would contain parking accessible from Washington Street. The ground floor would contain retail uses, a ramp leading to basement parking, and the building lobby (accessible by pedestrians from Columbus Avenue). Floors two through eight would be office floors. No on-site loading is proposed on B-Site.

The entire project would contain about 178,100 gross sq. ft. of office, about 21,600 gross sq. ft. of retail, about 53,700 gross sq. ft. of housing (80 single units and 40 double units) and about 51,900 gross sq. ft. of parking (139 spaces). The total FAR of the project averaged over both sites, would be about 8.6:1.

See Figures 2-14 for elevations, floor plans and building sections of the two proposed structures.

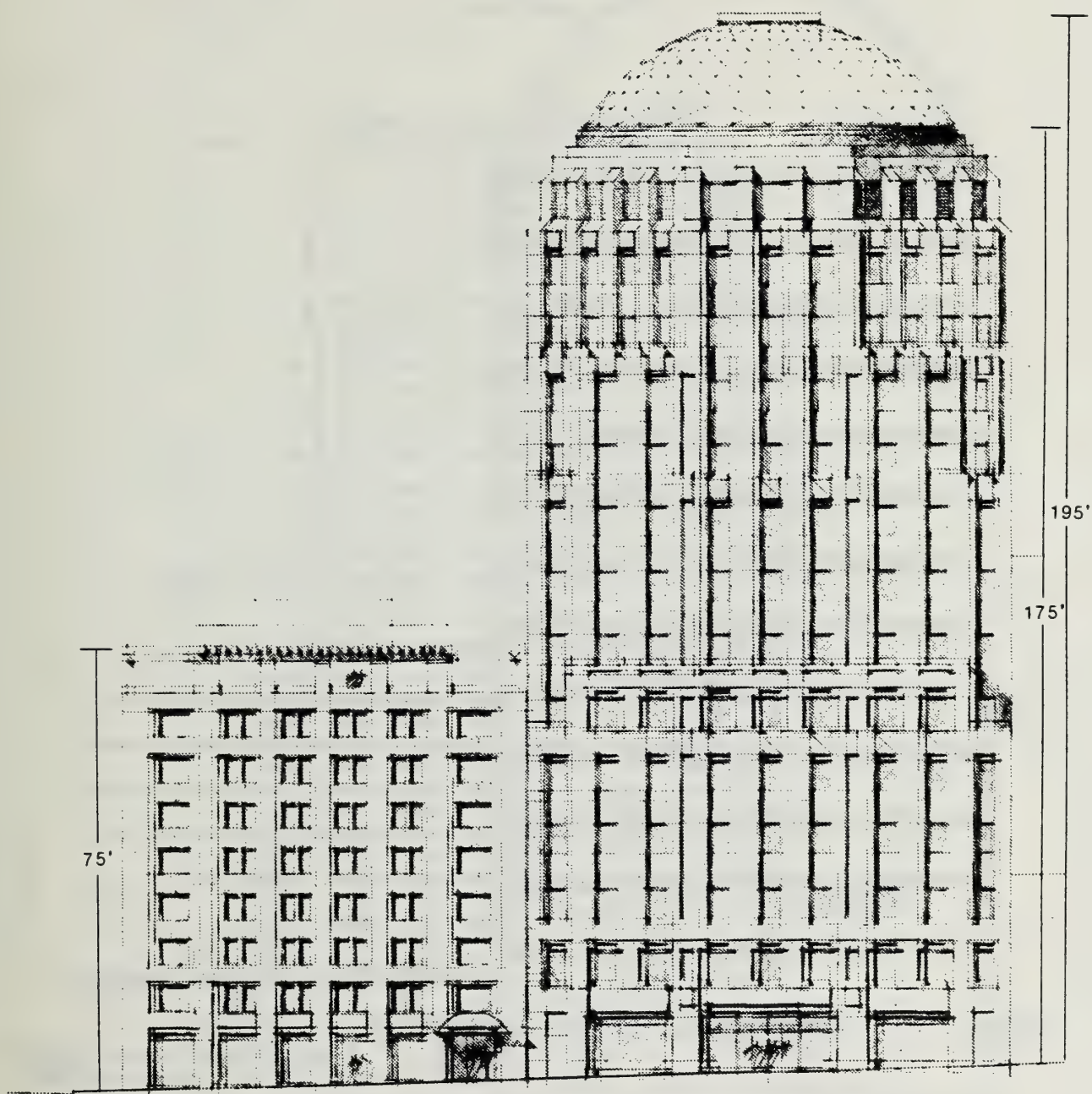


FIGURE 2
A-SITE

SOURCE: Heller & Leake

KEARNY STREET ELEVATION

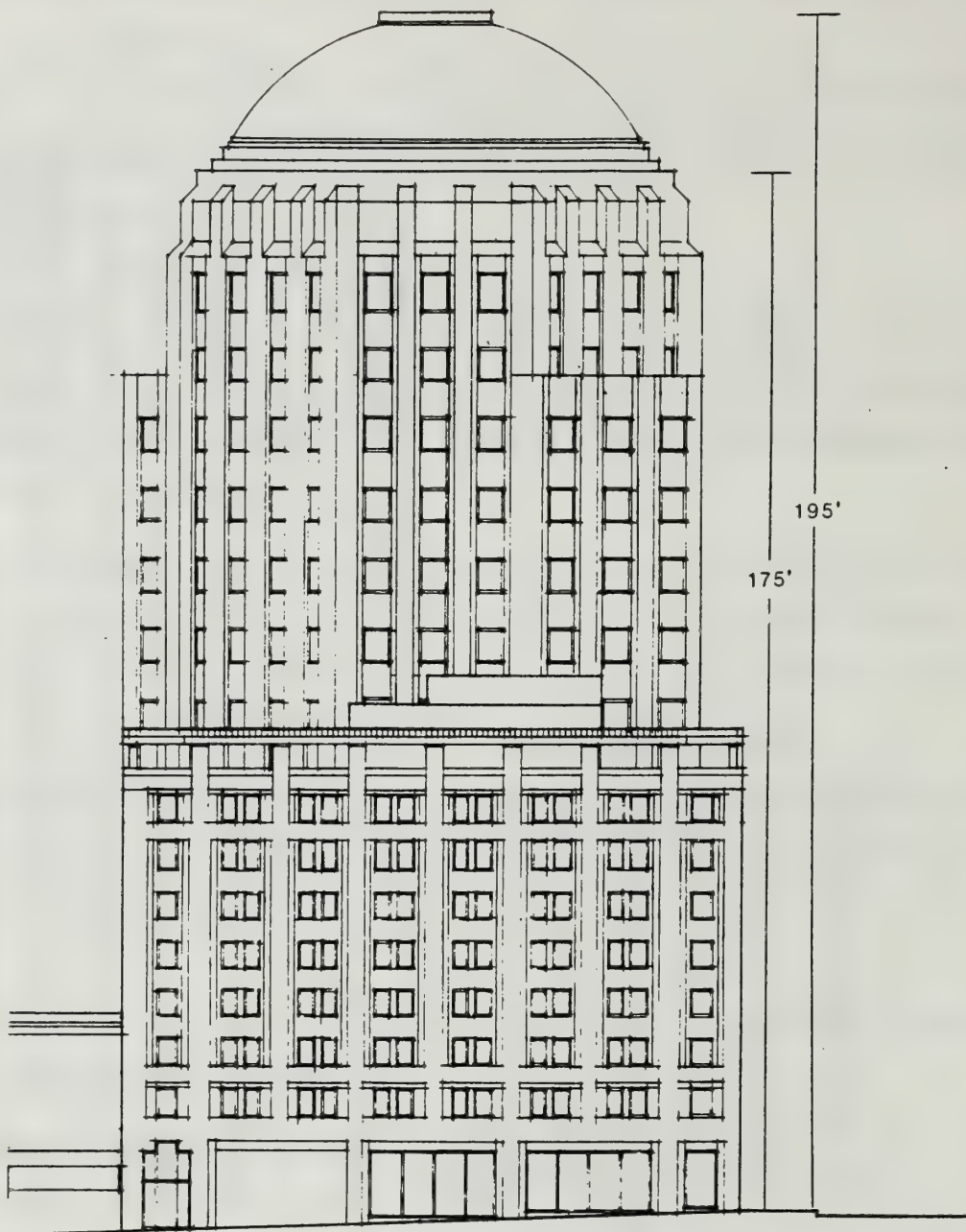


FIGURE 3

A-SITE

JACKSON STREET ELEVATION

SOURCE: Heller & Leake

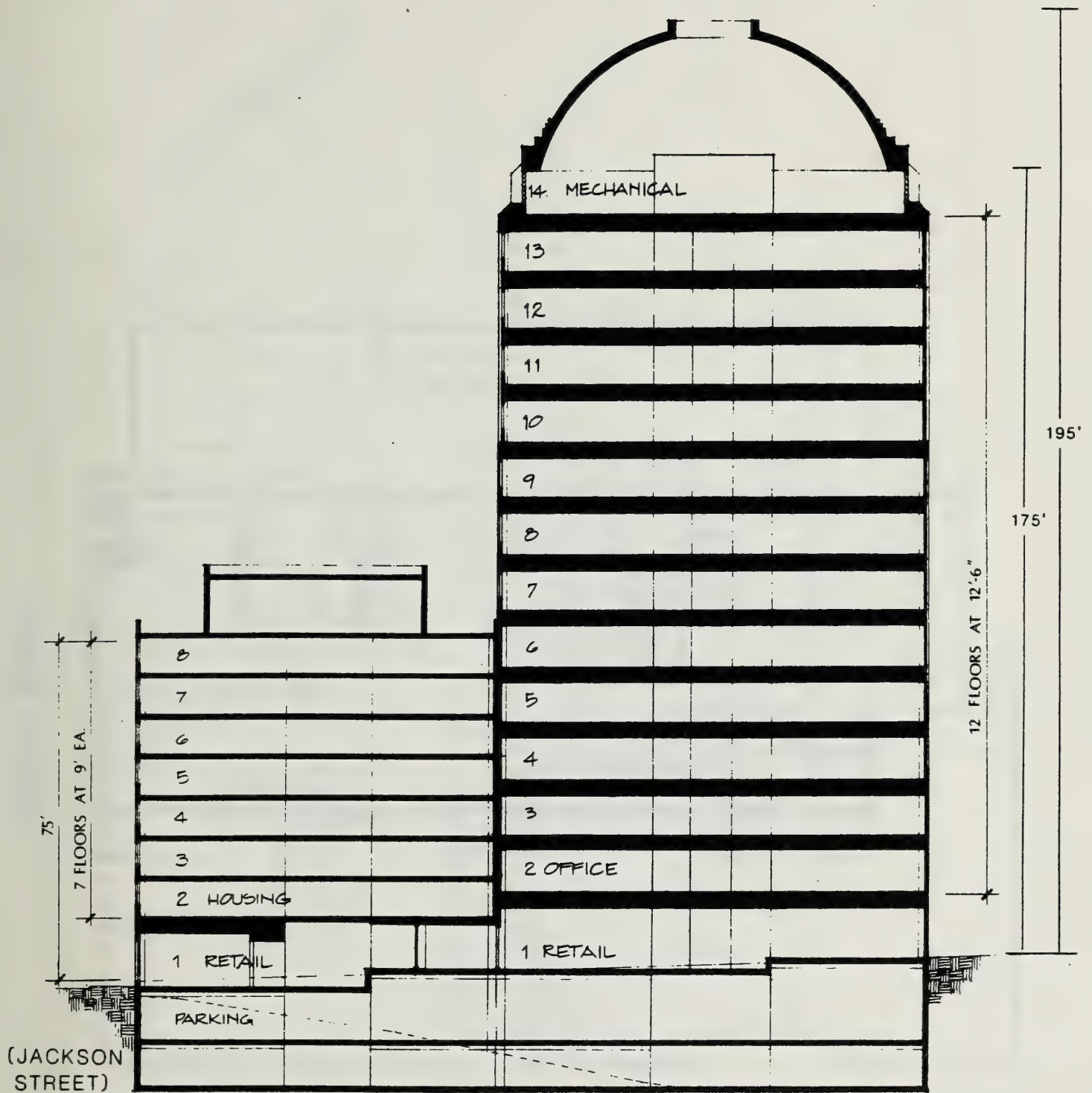


FIGURE 4
A-SITE
BUILDING SECTION

SOURCE: Heller & Leake

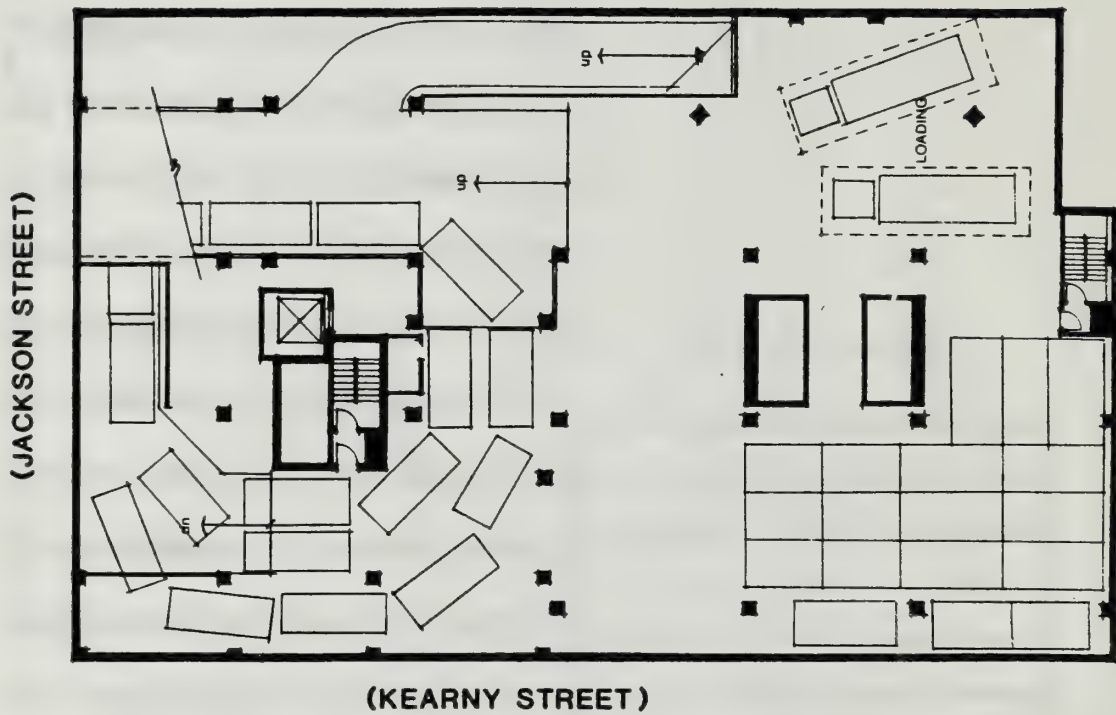


FIGURE 5
A-SITE

BASEMENT LEVEL PARKING PLAN

SOURCE: Heller & Leake

JACKSON STREET

COLUMBUS AVENUE

GIBB ALLEY

dn.

RETAIL

RETAIL

RETAIL

KEARNY STREET



SOURCE: Heller & Leake

FIGURE 6
A-SITE
GROUND FLOOR PLAN

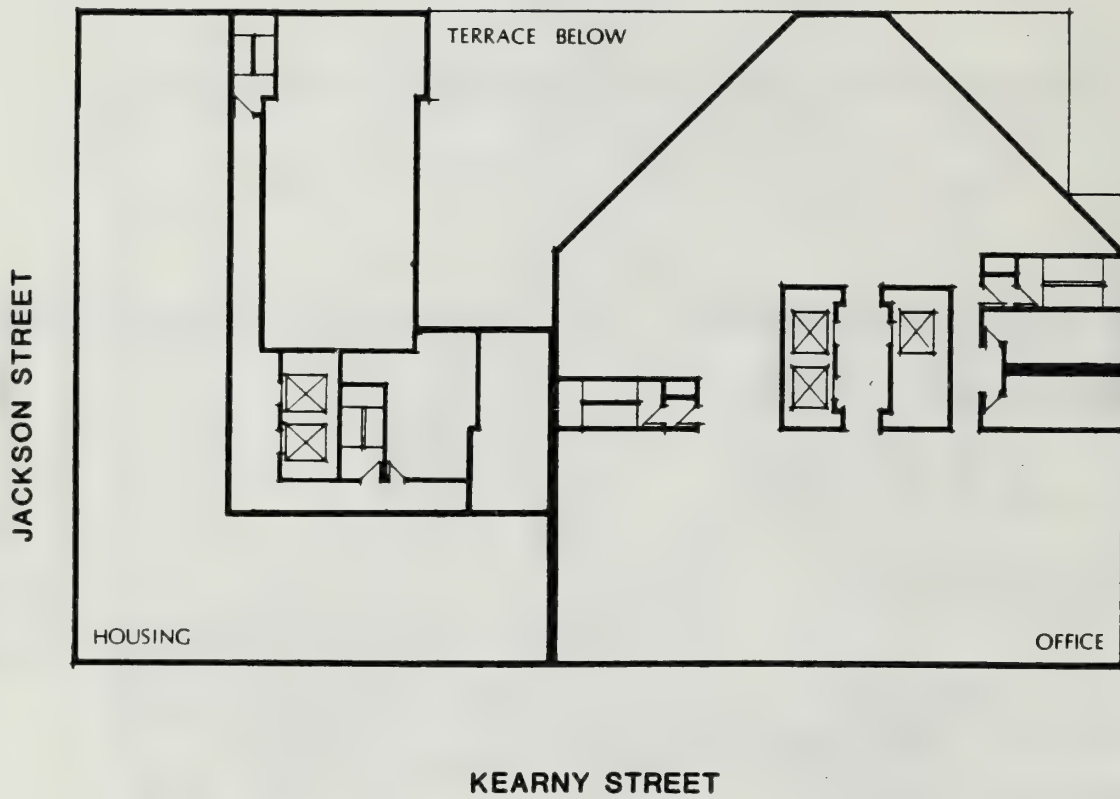
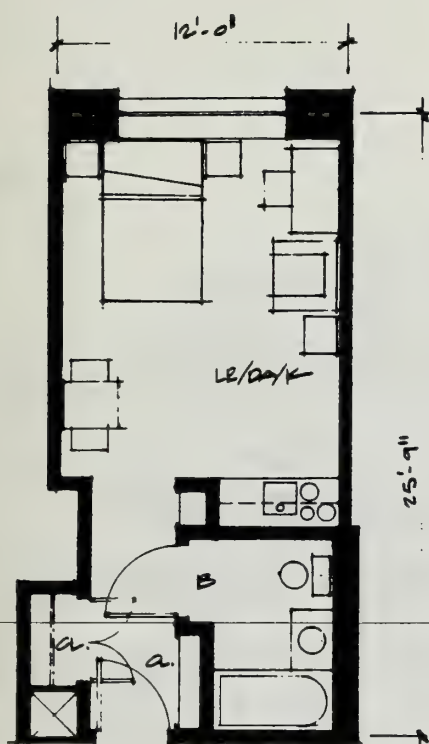
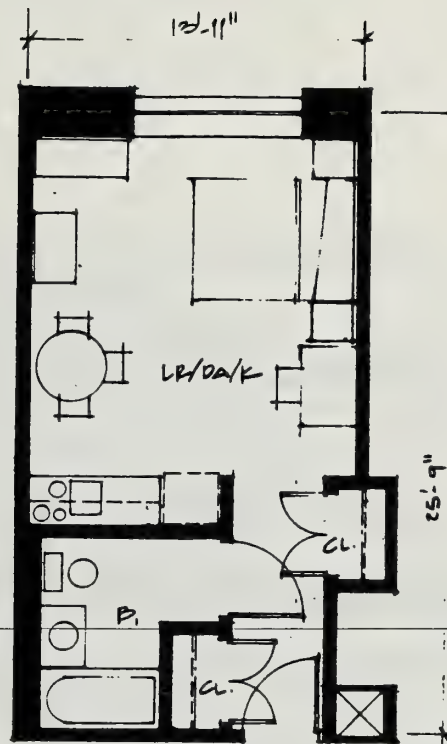


FIGURE 7
A-SITE
TYPICAL FLOOR PLAN

SOURCE: Heller & Leake



SINGLE UNIT
310 SQ. FT.

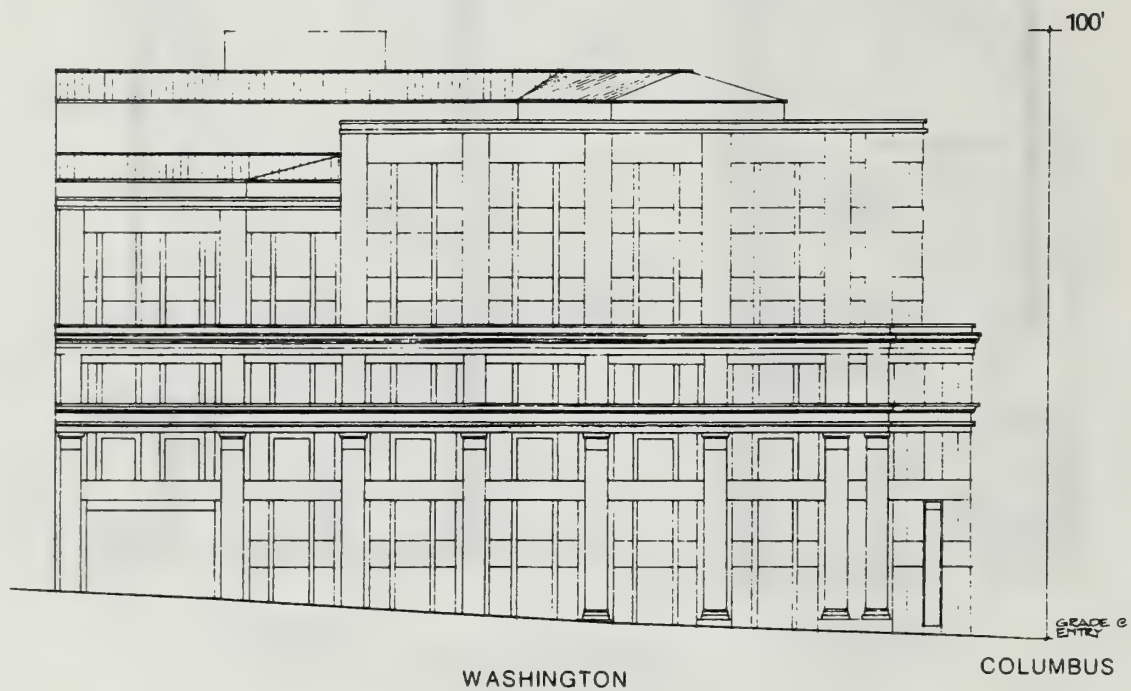


DOUBLE UNIT
360 SQ. FT.



FIGURE 8
A-SITE
HOUSING UNIT PLANS

SOURCE: Heller & Leake

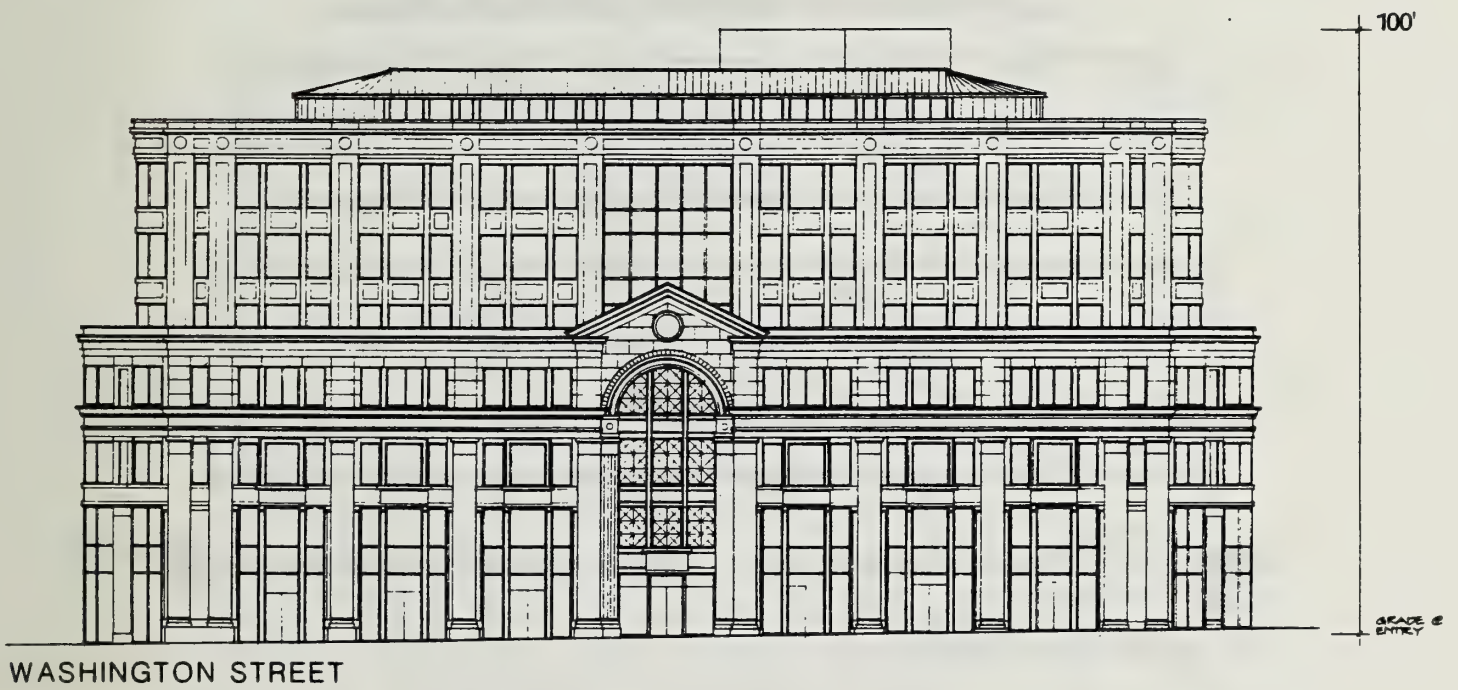


0 FEET 40

FIGURE 9
B-SITE

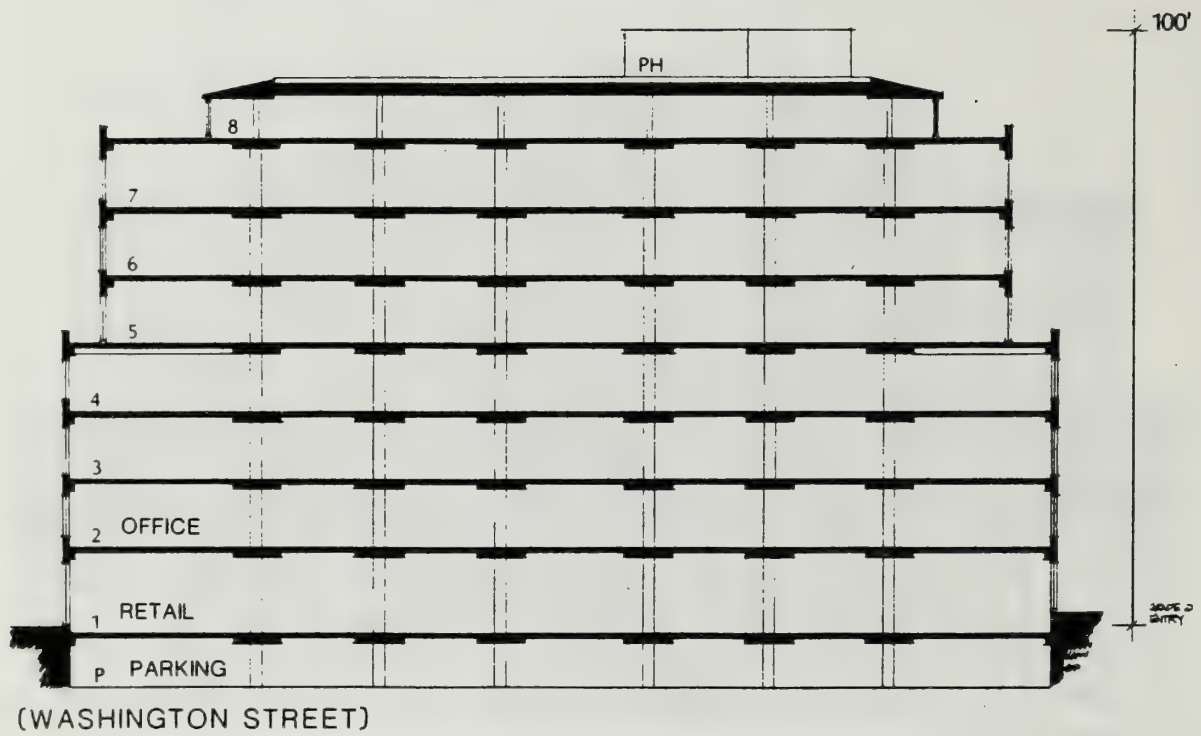
WASHINGTON STREET ELEVATION

SOURCE: Heller & Leake



SOURCE: Heller and Leake

FIGURE 10
B-SITE
COLUMBUS AVENUE ELEVATION



0 FEET 40

FIGURE 11
B-SITE
BUILDING SECTION

SOURCE: Heller & Leake

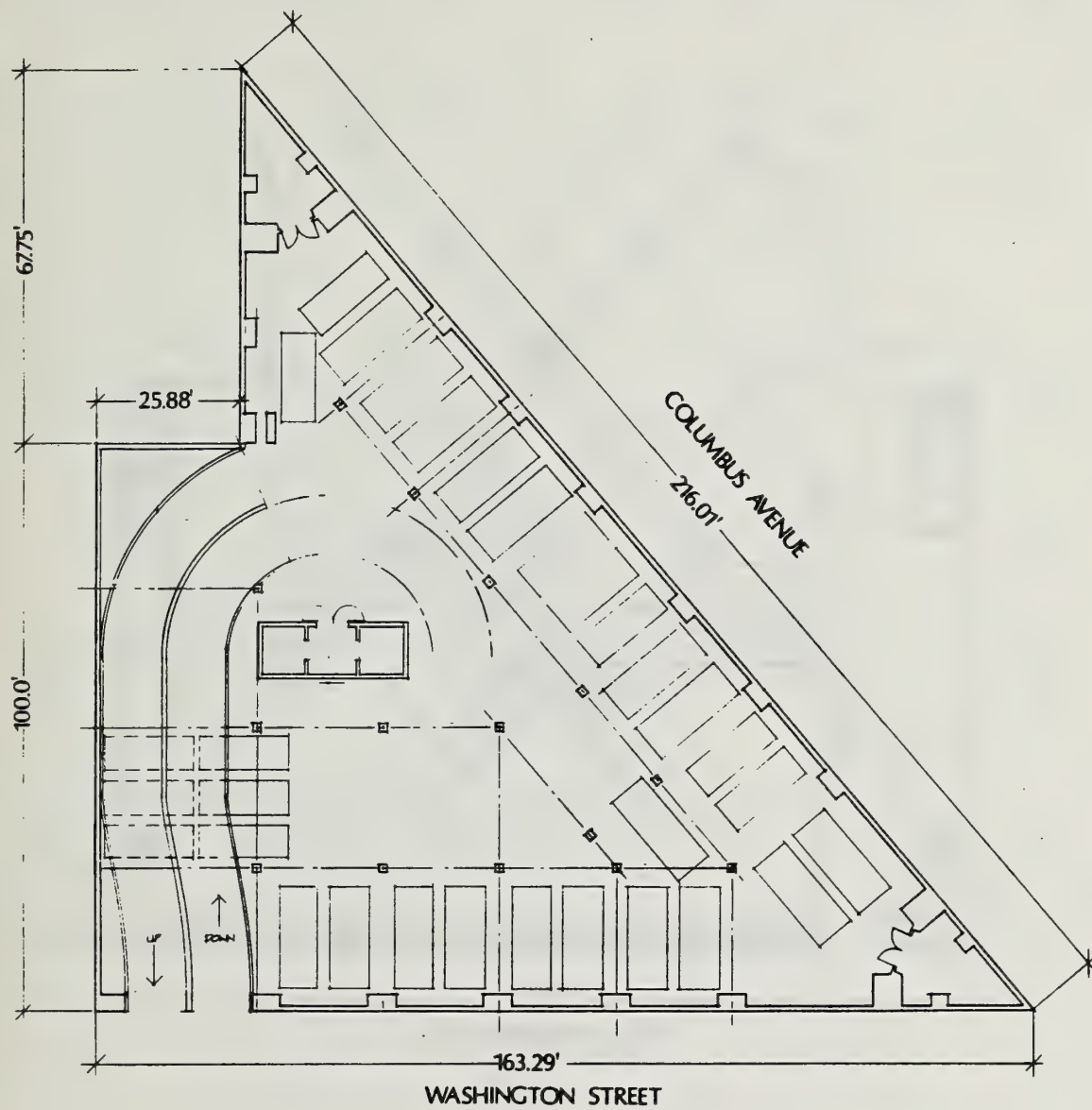


FIGURE 12
B-SITE

BASEMENT LEVEL PARKING PLAN

SOURCE: Heller & Leake

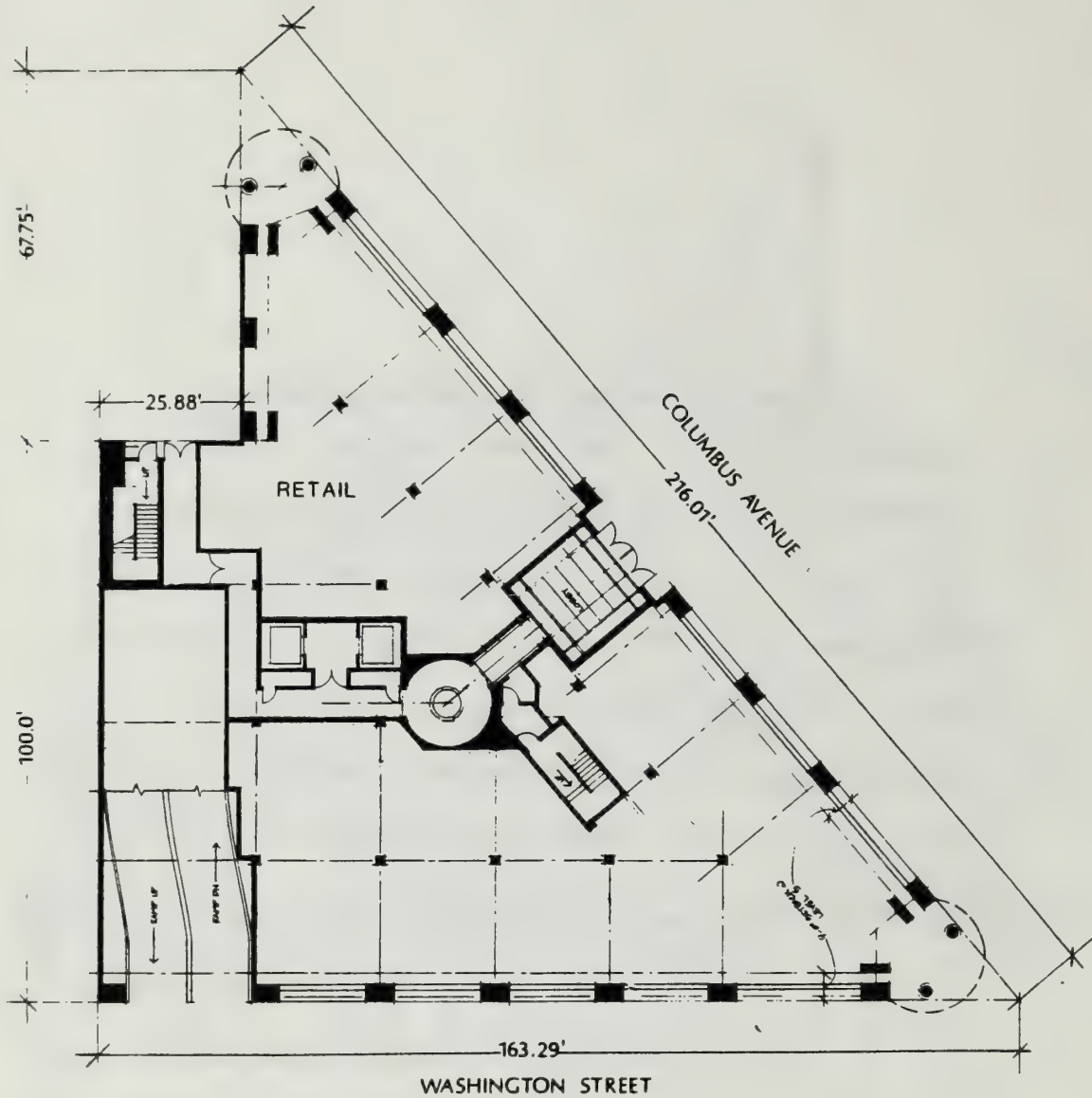
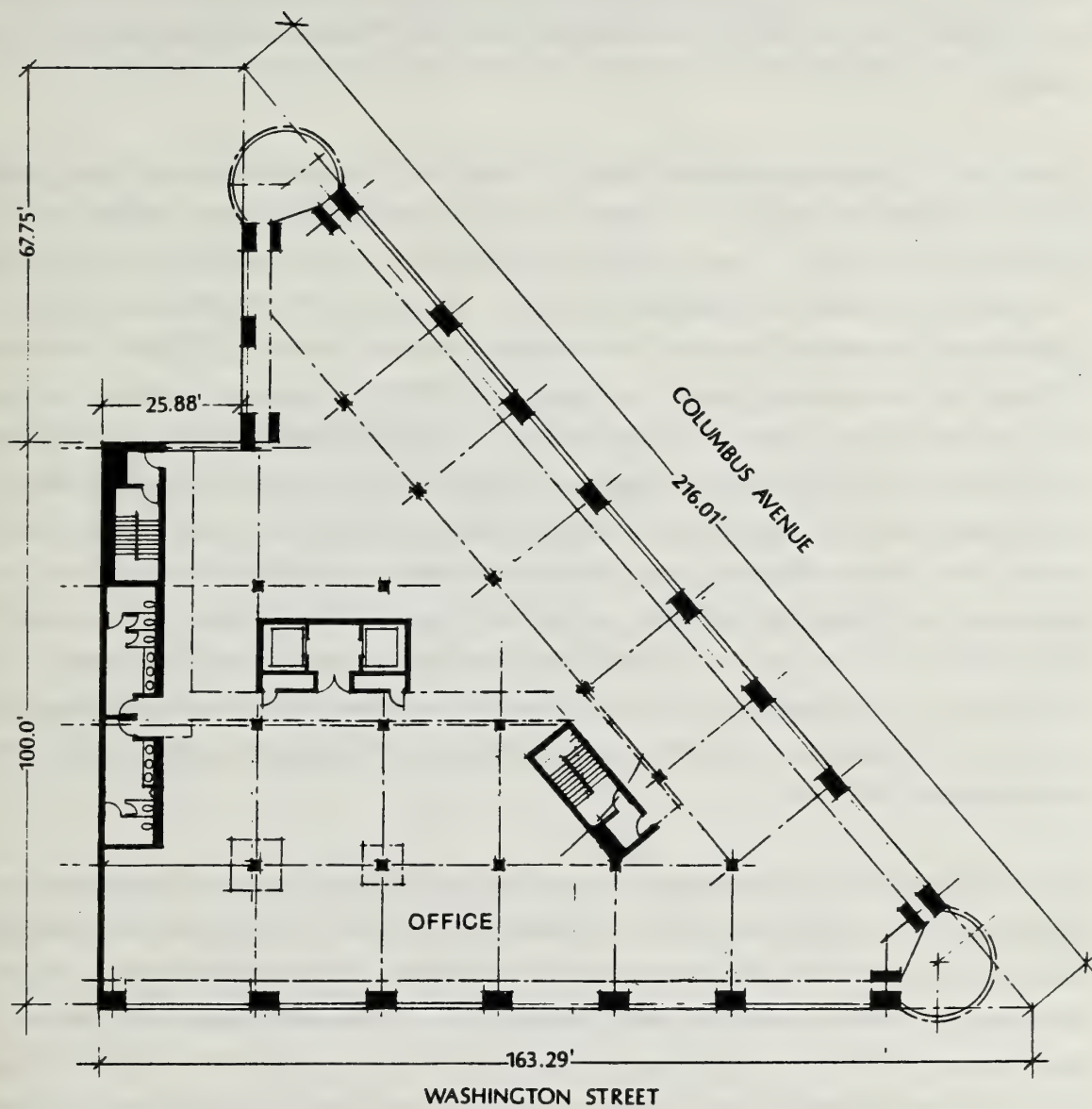


FIGURE 13

B-SITE

GROUND FLOOR PLAN

SOURCE: Heller and Leake



0 FEET 40

FIGURE 14
B-SITE
TYPICAL FLOOR PLAN

SOURCE: Heller and Leake

D. HISTORY OF A-SITE/2/

- A-Site, the location of the International Hotel (which was demolished in 1979) has been at the center of the controversy and debate about San Francisco housing policy for many years.

Prior to 1979, the International Hotel (I-Hotel), a 164-room residential hotel providing long-term low-cost housing to generally elderly Asian tenants, was located on the northern lot of A-Site. The I-Hotel was purchased by Four Seas Investment Corporation (the project sponsor) on September 15, 1973. In July of 1976, the Human Rights Commission requested that the San Francisco Housing Authority (SFHA) preserve the I-Hotel for low-income housing. In October of 1976 the Housing Authority designated the site for low-income housing. On November 30, 1976, the Board of Supervisors adopted two resolutions, the first approving the I-Hotel site for approximately 150 units of low-income housing, and the second appropriating \$1.3 million from CDBG funds for site acquisition. Former Mayor George Moscone intended that CDBG funds be used to purchase the I-Hotel for resale to the I-Hotel Tenants Association. In December of 1976, the SFHA offered to buy the I-Hotel; the offer was refused. The SFHA then secured a court order to take possession of the I-Hotel. Four Seas filed a legal challenge and the court ruled in its favor. I-Hotel tenants were evicted on August 4, 1977. The I-Hotel was demolished in 1979./2/

In October of 1979, Mayor Feinstein appointed a Citizens' Advisory Committee for development of the I-Hotel Block. A Development Plan for the entire block was prepared by the Department of City Planning and the Citizens' Advisory Committee. Phase I of the plan proposed 192 dwelling units, 6,900 sq. ft. of community space, 13,500 sq. ft. of open space and 250 to 280 parking spaces, for all of the vacant lots on this block along Kearny Street, including the I-Hotel site (A-Site), and the Fan Tec site at the corner of Kearny and Washington Streets (Lot 10, not a part of this project).

In April of 1982, interim zoning of the I-Hotel block from C-2 to RC-4 was approved by the Planning Commission and the Board of Supervisors; this interim zoning was extended for six months in April of 1983, when it expired.

In September of 1984, the Mayor, Four Seas and the I-Hotel Block Citizens' Advisory Committee signed a "Memorandum of Understanding" (MOU), whereby Four Seas proposed a project with two 12-story office buildings and 140 residential units for the elderly, to

II. Project Description

which the Mayor agreed to commit \$1.5 million of CDBG funding. Elderly and disabled tenants of the I-Hotel at the time of the eviction would be given first priority for these units. (The Memorandum of Understanding is included as Appendix E, p. A-55 of this report.) This project is proposed by Four Seas in response to that Memorandum.

E. PROJECT SCHEDULE, COST AND APPROVAL REQUIREMENTS

PROJECT SCHEDULE

The project sponsor expects project review and design to be completed during the second half of 1986. Construction would take about 22 months. Project occupancy would begin in early 1988.

COST

The estimated construction cost of the project is about \$24.5 million (1984 dollars), including demolition, and building shell and interior improvements. Replacement cost for both buildings, including land, architectural and engineering fees, and tenant improvements, would be about \$41 million. Office space is expected to rent for about \$26 to \$32 per sq. ft. per year. Retail space is expected to rent for about \$28 to \$36 per sq. ft. per year. The total cost of the housing portion of the project would be about \$5 million. The project has received a commitment for \$1.5 million of Community Development Block Grant (CDBG) funds to subsidize construction of the housing on the site. The remaining \$3.5 million would be funded using tax exempt bonds; the interest rate on the bonds shall not exceed 10.5%. Rent from the residences would go toward paying the interest on these bonds; the project sponsor would pay the remainder. Housing units are expected to rent (monthly) for about \$310 for single units and \$360 for double units.

APPROVAL REQUIREMENTS

Following a public hearing before the City Planning Commission on the Draft EIR, responses to all written and oral comments received during the Draft EIR public review period will be prepared, and the EIR will be revised as appropriate and presented to the City Planning Commission for certification as to accuracy, objectivity and completeness. No permits may be issued before the Final EIR is certified.

II. Project Description

- The project would require Conditional Use (CU) authorization for building heights over 35 ft. (pursuant to the Chinatown Permanent Controls). The project would require a CU for height above 65 ft. in a 65-D-2 District. In approving a CU for additional height above 65 ft. in a 65-D-2 Height and Bulk District, the City Planning Commission must find that the increased height provides: "1) the siting of buildings so as to produce a stepping down of height from the Downtown office district to . . . Jackson Square; 2) avoidance of excessive bulk, intrusiveness or a continuous wall of buildings that would adversely affect views, penetration of sunlight or pedestrian amenity in Jackson Square or in any other area; and 3) respect for the historical and architectural character and special scale of Jackson Square" (City Planning Code Section 263.1).

The project is located in the Washington/Broadway Special Use District No. 1 and would not be required to provide parking for any use other than dwellings, since neither site exceeds 20,000 gross sq. ft. Twenty-four parking spaces would be required for the 120 elderly housing units on A-Site (Planning Code Section 151 requires one-fifth of the parking requirement of one space per dwelling unit for senior citizen housing); 108 valet or 54 independently accessible parking spaces are proposed on A-Site, 24 of which would be reserved for residential tenants. Thirty-one valet or 15 independently accessible parking spaces are proposed on B-Site, for a total of 139 valet or 69 independently accessible spaces for the entire project. Section 204.5(c) of the Planning Code allows seven percent of the gross floor area as accessory parking, which would be about 6,356 sq. ft. on B-Site (about 18 valet spaces) and about 7,624 sq. ft. on A-Site (about 22 valet spaces). CU authorization would be necessary for the additional square footage of parking proposed (7,704 sq. ft. on B-Site and 30,216 sq. ft. on A-Site). The project sponsor would seek CU authorization for a total of about 75 valet spaces.

Both project buildings would require exceptions from bulk requirements (see Table 1).

- The project would not meet the Planning Code site coverage requirement for Chinatown Mixed Use Districts (Section 134.1). In Mixed Use Districts at the lowest story occupied as a dwelling, the site coverage allowed is no more than 75%. The non-covered area requirement may be provided in a location other than the rear yard, including roof top terraces and balconies. The project sponsor would seek a variance from this requirement.

- On November 14, 1986, the voters of San Francisco passed Proposition M, the Accountable Planning Initiative. It amends Section 320(g)(1) of the City Planning Code to lower the threshold for office projects subject to the annual limit from 50,000 to 25,000 gsf of additional office space. Since the proposed project would add office space in excess of 25,000 gsf, it is now subject to the provisions of Sections 320 - 325 as amended by Proposition M. Proposition M also adds Section 321.1 to the Planning Code, and reduces the approval period from three years to one year; and changes the limitation amount from 2.85 million sq. ft. of office space over three years to 950,000 gsf in each one-year period. Section 321.1 requires the adjustment of the 950,000 square foot annual limit by limiting new office space approvals to 475,000 gsf annually until the total amount of space approved since November 29, 1984 is reduced to zero in annual increments of 475,000 square feet. Up to 950,000 gsf may be approved during the approval period ending October 1987 because no projects were approved under the Office Limitation Program during the first year period ending October 17, 1986.
- Proposition M also establishes eight Priority Policies. These policies are: preservation and enhancement of neighborhood-serving retail uses; protection of neighborhood character; preservation and enhancement of affordable housing; discouragement of commuter automobiles; protection of industrial and service land uses from commercial office development and enhancement of resident employment business ownership; earthquake preparedness; landmark and historic building preservation; and protection of open space. Prior to issuing a permit for any project which requires an Initial Study under CEQA or adopting any zoning ordinance or development agreement, the City is required to find that the proposed project or legislation is consistent with the Priority Policies. The City Planning Commission, in its decision regarding the proposed project approval or disapproval would make a determination of the project's conformance with the Priority Policies.
- The proposed project is exempt from the provisions of Section 321 et seq. of the City Planning Code growth limitation provisions (Section 320(g)(5)). However, the square footage of additional office space approved by the Commission would be counted against the annual limit of 950,000 sq. ft. (475,000 sq. ft. of new office space until the total amount of space approved since November 29, 1984, is reduced to zero in annual increments of 475,000 sq. ft.).

II. Project Description

Following project approval by the City Planning Commission, the sponsor must obtain demolition, building and related permits from the Central Permit Bureau of the Department of Public Works.

NOTES - Project Description

/1/ Vorapol Mahaguna, project sponsor, interview, November 26, 1985.

- /2/ International Hotel Chronology, Department of City Planning, dated March 9, 1984; this memorandum is available for public review at the Office of Environmental Review, 450 McAllister Street, San Francisco. Additional information on the social and political history of the International Hotel site is available from a variety of sources. A history of events over a period of 100 years has been compiled by the Kearny Street Research Project, and is also available in the project case file. A movie, "The Fall of the International Hotel," was produced. The events summarized in the text were covered in the local press as well.

III. ENVIRONMENTAL SETTING

A. LAND USE AND ZONING

LAND USE

The project block is centrally located where four city districts meet: North Beach, Jackson Square, Chinatown, and the Financial District. The Financial District boundary is easily definable by the limit of the C-3-O use district south across Washington Street from B-Site, and by the highrise structures along the boundary. The boundaries of the other three districts are less clear-cut. Office, retail and residential uses occupy buildings in the vicinity; the scale and character of buildings are generally representative of the neighborhood in which they are located.

The North Beach community to the north is primarily low-rise multi-family residential buildings with ground-floor retail uses, which historically have catered to a large Italian population. In recent years, increasing numbers of Chinese immigrants have moved into residential units and have bought businesses. Columbus Avenue and Broadway are the primary commercial streets in the area. Broadway is known for its concentration of adult night clubs, bars, and bookstores.

Jackson Square, located east of Columbus Avenue and south of Broadway, contains buildings which are the sole survivors of the early central business district of San Francisco, and thus the sole physical reminders of the City's beginnings as a great port and mercantile center. The oldest buildings, those on Montgomery Street, date back to the early 1850s, but the more well known are on Jackson Street, dating from the 1860s, and it is from the latter that the whole district takes its name. Jackson Square is a National Register Historic District.

The Chinatown neighborhood to the west of the project block contains a dense mixture of low-rise commercial and residential uses. Tourist-oriented and community-serving retail

shops and restaurants, and Chinese import companies, are dominant in the community. New development is occurring in the project area: 801 Montgomery Street is under construction, the Columbus/Pacific (Savoy) office building was recently completed, and buildings at 900 Kearny Street and 50 Osgood Place have been approved for construction.

Within the Financial District, south of the project block, high-rise structures provide office, retail, and some residential uses. The project block is located across Washington Street from the 300-ft.-tall Chinatown Holiday Inn and the 300-ft.-tall Montgomery/Washington residential and office building. The 850-ft.-tall Transamerica Pyramid office building is located southeast of B-Site across Montgomery and Washington Streets. Two office structures, within two blocks south of the project block, 505 Montgomery and the Bank of Canton, are under construction or recently completed.

Development of the project is proposed on two separate sites. A-Site is located at the southeastern corner of the intersection of Kearny and Jackson Streets; B-Site is located at the northwestern corner of the intersection of Washington Street, Columbus Avenue, and Montgomery Street. A-Site is vacant, as is about one-third (Lot 5) of B-Site. The International Hotel (I-Hotel), a residential hotel, and a smaller (approximately 30-unit) residential hotel (the Victory) were located on A-Site until they were demolished in 1979. The two-story Colombo Building (on Lot 4 of B-Site) contains ground-floor retail (about 5,800 sq. ft.) with office (about 5,800 sq. ft.) above. The now-vacant lot on B-Site was previously occupied by a residential hotel (the Bell) with approximately 70 units; this hotel was vacant for five years prior to its demolition in 1979. Ground-floor businesses in the Colombo Building include a building maintenance service, an office supply store, a sporting goods store, a barber shop, a photo store, and the Fort Mason Downtown Information Center. One store front is vacant. The second floor of the building consists of office space, containing an architectural firm and a travel agent.

Other uses on the project block include: a three-story apartment building at 636 - 640 Washington Street; a three-story building with a sewing shop on the ground floor and apartments above at 642 Washington; a three-story building with sewing shops and a restaurant at 650 - 654 Washington; and a Metro parking lot at the northeast corner of the Kearny/Washington Streets intersection. Located on the interior of the project block is a two-story structure on Gibb Street, occupied by an insurance company and a travel agency. The Jackson Street and Columbus Avenue portions of the block include a clothing

store in a two-story building at 535 Jackson; a restaurant with apartments above at 531 Jackson; and a restaurant and ice cream shop with apartments above at 59 Columbus Avenue. Figure 15, p. 41 shows land uses in the project area.

In October of 1979, Mayor Feinstein appointed a Citizens' Advisory Committee for development of the I-Hotel Block. A Development Plan was prepared by the Department of City Planning and the Citizens' Advisory Committee. The plan proposed 192 dwelling units, 6,900 sq. ft. of community space, 13,500 sq. ft. of open space and 250 to 280 parking spaces, for all of the vacant lots on this block along Kearny Street, including the I-Hotel site (A-Site), and the Fan Tec site at the corner of Kearny and Washington Streets (Lot 10, not a part of this project). A copy of the Development Plan is on file and available for public review at the Department of City Planning.

Two plans for Chinatown have recently been prepared: "A Plan for Chinatown," prepared for the Chinese Consolidated Benevolent Association (Chinese Six Companies) by Blayney-Dyett, Planners and Tosta & Browning, Attorneys; and the "Chinatown Community Plan," prepared by Asian Neighborhood Design, the Chinese Chamber of Commerce and the Chinatown Neighborhood Improvement Resource Center. A third plan by the Department of City Planning is in preparation and is expected to be published in the spring of 1986.

Master Plan

The project would address Objective 3, Policy 1, of the Commerce and Industry Element of the Master Plan, which states, "promote the attraction, retention and expansion of commercial . . . firms which provide employment opportunities for unskilled and semi-skilled workers." Some of the businesses that would be attracted to the project would provide employment opportunities for clerical and semi-skilled workers. The proposed retail and residential uses, and building maintenance, would provide some entry-level job opportunities for semi-skilled and unskilled workers. (See Chapter IV, Section G., p. 134 for a discussion of employment opportunities that would be created by the project.)

Objective 6, Policy 1 of the Commerce and Industry Element encourages "continued growth of prime downtown office activities so long as undesirable consequences of growth can be avoided." The project would contribute to cumulative traffic and air quality

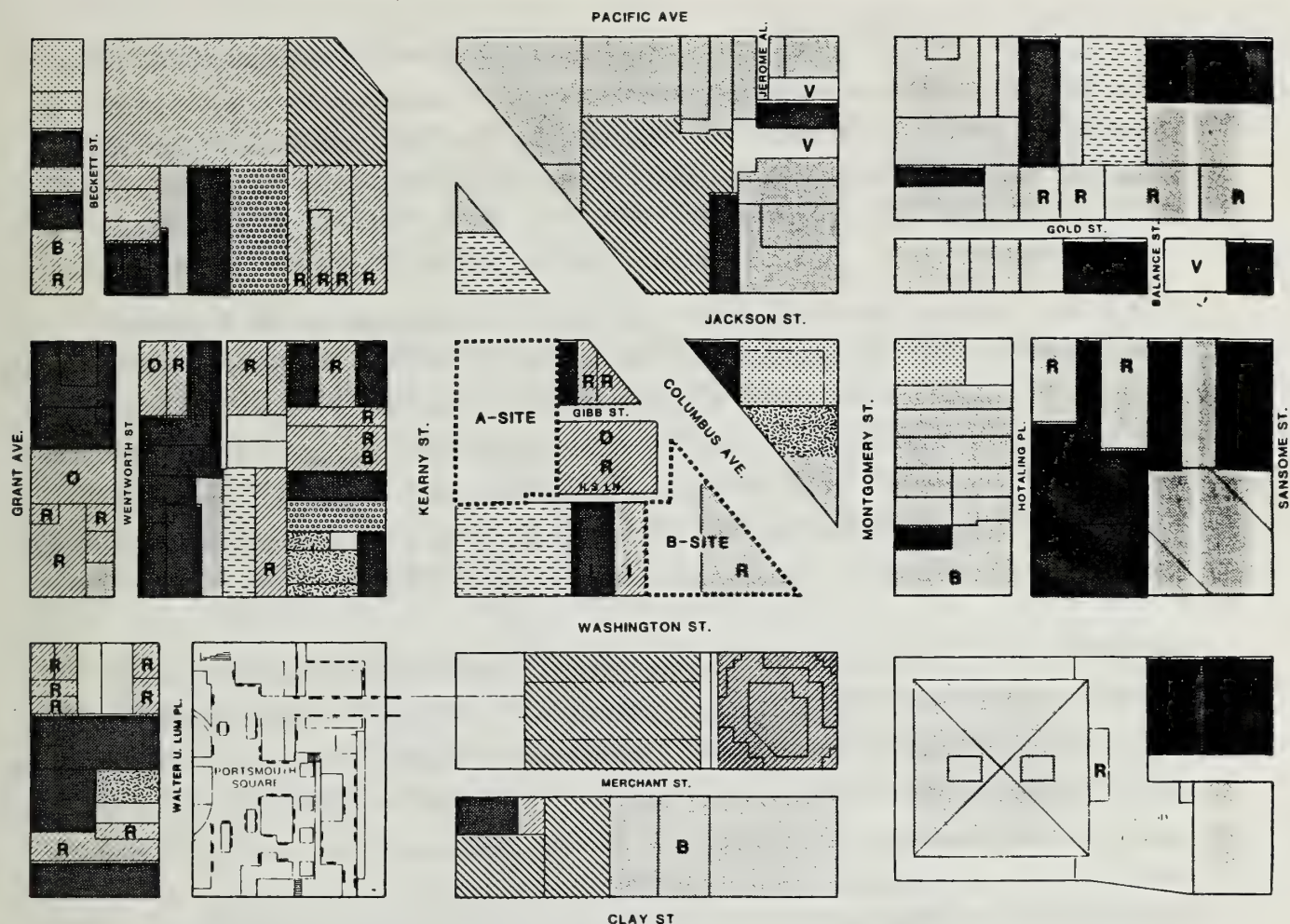


FIGURE 15
EXISTING LAND USES

SOURCE: ESA

effects in San Francisco. Policy 2 under Objective 6 states, "guide location of office development to maintain a compact downtown core so as to minimize displacement of other viable uses." The project is immediately north of the Financial District, and it would be constructed on the periphery of the downtown. The site is served by public transit (see Figure 34, p. 106).

The project responds to several policies and objectives contained in the Residence Element of the City's Comprehensive Plan, including Objective 1, which seeks to "provide new housing for all income groups in appropriate locations" and Objective 1, Policy 3, which promotes "mixed residential/office building development near the heart of downtown." The project would be responsive to Objective 2, Policy 2, which aims to "encourage higher residential density in areas adjacent to downtown and in neighborhood commercial districts where higher density will not have harmful effects."

Objective 5 of the Element is to "provide housing affordable by all income groups, particularly low- and moderate-income households." The project would respond to this Objective by providing housing to low-income, elderly tenants. The project would address Policy 1 of this element, which states "use the City's financial powers and resources to reduce the cost and increase the supply of low and moderate income housing" and to Policy 2, to "make maximum use of available Federal and State housing subsidy programs." The low-income elderly units would receive Community Development Block Grant funds.

Objective 7, Policy 3 states, "The City should take an active role to encourage the expansion of the availability of housing units suited to needs of . . . groups [such as the disabled, elderly and newly immigrated]"; and Objective 7, Policy 6 seeks to "provide adequate rental housing opportunities." Objective 3, Policy 3, regarding the preservation of residential hotels, states, "Demolition or conversion of a residential [hotel] unit should be permitted only if provision is made for replacing the unit to be lost with a comparable unit elsewhere."

- Objectives and Policies of the Chinatown Plan, a part of the Master Plan apply to the project. The City Planning Commission will consider the project in the context of these Objectives and Policies, as did the Board of Supervisors and Mayor in their consideration of new zoning regulations. Objective 1 states, "preserve the distinctive urban

III. Environmental Setting

character, physical environment and cultural heritage of Chinatown." Policy 1 of Objective 1 states, "maintain the low-rise scale of Chinatown's buildings." The project would include heights up to 200 feet. This could be permitted with Conditional Use Authorization in the 65-D-2 height and bulk district.

Objective 3 of the Chinatown Plan states, "stabilize and where possible increase the supply of housing." Policies 1 and 2 of this Objective state, respectively, "Conserve existing housing," and "Increase the supply of housing." The project would occupy a site (A-Site) where housing was located prior to 1979. The project would provide 120 housing units on A-Site. All of these units would be specifically designed for and occupied by senior citizens and the physically handicapped.

Objective 4 states, "Preserve the urban role of Chinatown as a residential neighborhood," and Policy 1 of Objective 4 states, "Protect and enhance neighborhood-serving character of commercial uses in predominately residential areas." The project would provide about 21,600 gsf of retail space, which would be intended for neighborhood-serving retail and restaurant uses.

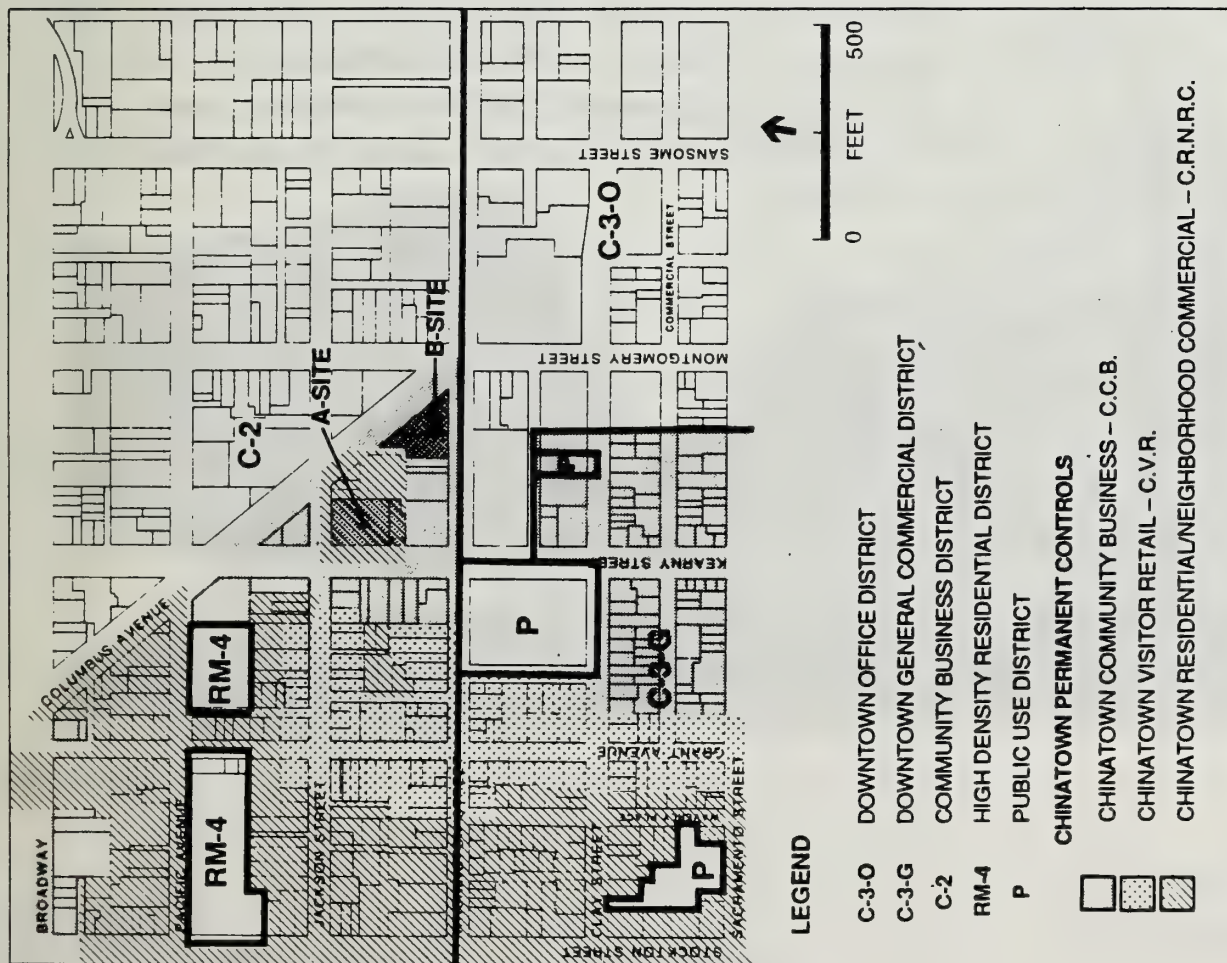
Policy 2 of Objective 4 states, "Promote a building form that harmonizes with the scale of existing buildings and width of Chinatown's streets." Supporting text for that Policy includes recommended urban design guidelines, such as a maximum width along street frontage of 50 ft. to 75 ft. for buildings over 40 ft. in height; and where projects are more than 50 ft. in width along the street, street frontage should be divided in architectural treatment to appear as independent buildings. The project frontage along Kearny Street would be about 175 ft. wide (A-Site); the project frontage along Columbus Avenue would be about 216 ft. Buildings on both A-Site and B-Site would incorporate design features such as architectural base elements, and setbacks intended to reduce the appearance of bulk. However, the project structures would exceed the 50 ft. to 75 ft. frontage width along Kearny Street and along Columbus Avenue.

- Objectives and Policies of the Urban Design Element are discussed on pp. 82 to 84; Objectives and Policies of the Urban Design Element relating to Architectural Resources are discussed on p. 101.

ZONING

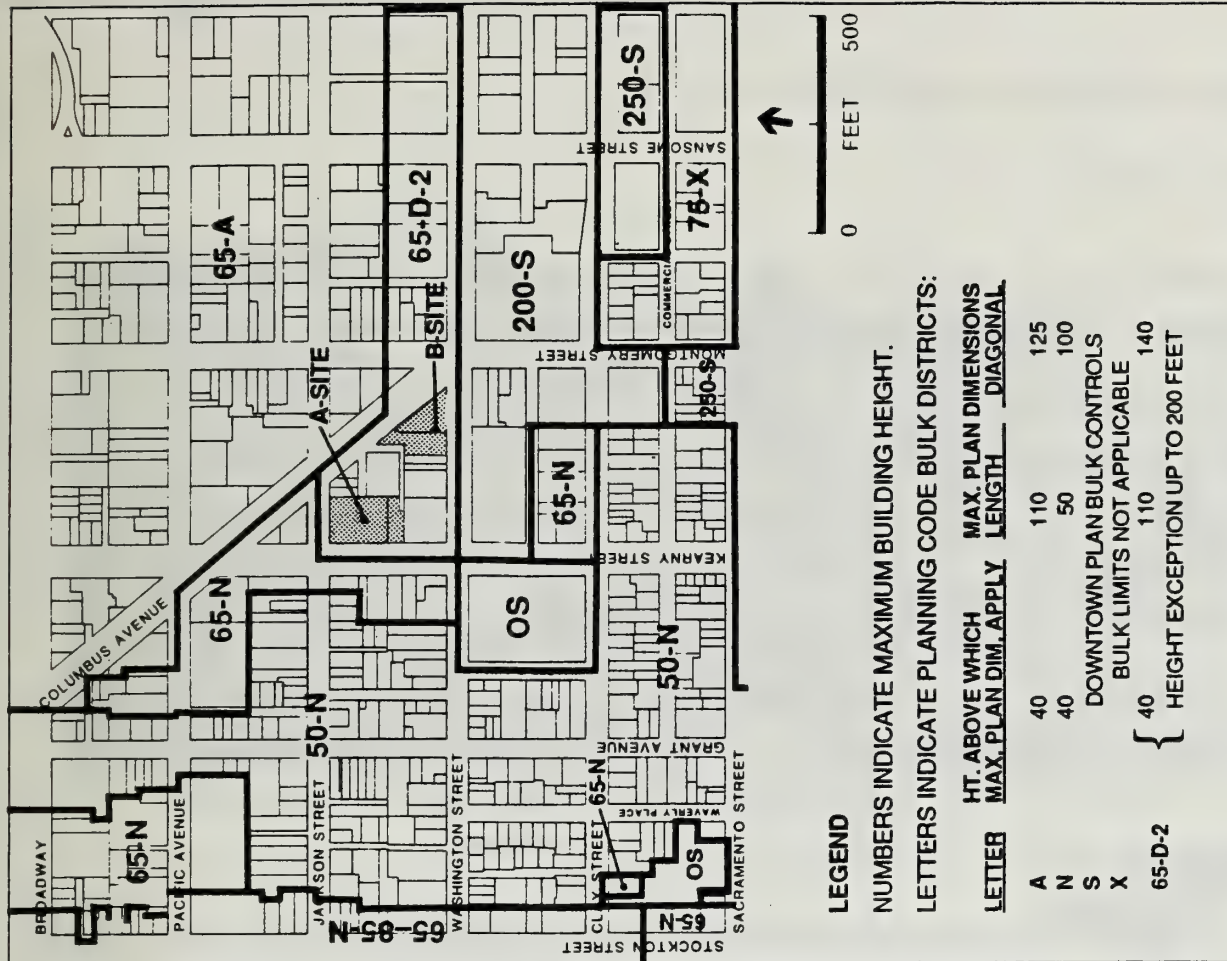
- Under the Chinatown Permanent Controls, A-Site is in the Chinatown Residential/Neighborhood Commercial (CR/NC) Use District and B-Site is in the Chinatown Community Business (CCB) Use District. The Chinatown Permanent Controls were adopted by the City Planning Commission February 19, 1987, and the Board of Supervisors on April 13, 1987 and signed by the Mayor, April 24, 1987; they become effective as of May 24, 1987. The basic commercial Floor Area Ratio (FAR) for the CR/NC District is 1.0:1 and 2.8:1 for the CCB District. The project would be exempt from both CR/NC and CCB FAR limits because of the creation of low-income housing on A-Site, which will be partially financed by Community Development Block-Grant (CDBG) funds (pursuant to Section 124.1(a)). This section provides that developments with a commitment of CDBG funds as of January 10, 1985 for the creation of new housing can be developed under the FAR of the underlying zoning that was in effect as of January 9, 1985. The basic FAR for the project sites is, as under the underlying C-2 zoning, 10.0:1 (in accordance with Section 124(c) of the City Planning Code, since both sites are nearer to a C-3 District than to any R District). Under Sections 125(a) and 125(b) of the City Planning Code, both sites would be eligible for corner lot and through (interior) lot premiums; the permitted FAR for both sites would thus be about 12.0:1. The Permanent Controls require Conditional Use (CU) authorization for new construction above a height of 35 ft. (pursuant to Section 132.3 and 254) to allow for sunlight access to Chinatown sidewalks. Blocks north and east of the site are zoned C-2; blocks west of the site are zoned CCB; blocks south of the site are zone C-3 (Portsmouth Square is zoned P). City Planning Code Use Districts are shown in Figure 16, p. 44.
- Both A- and B-Sites are in a 65-D-2 Height and Bulk District, in which the maximum allowable height is 65 ft., and, above 40 ft. in height, the maximum allowable length and diagonal dimensions are 100 and 140 ft., respectively. Heights above 65 ft., to a maximum of 200 ft., in the 65-D-2 Height and Bulk District may be approved by the City Planning Commission as a Conditional Use (CU) in appropriate cases. Immediately south of the project block is a 200-S height and bulk district. City Planning Code Height and Bulk Districts are shown in Figure 16, p. 44.

The project sites are located in the Washington/Broadway Special Use District No. 1 where parking is not required for any use other than dwellings when site area does not exceed 20,000 gross sq. ft.



PLANNING CODE USE DISTRICTS

SOURCE: Department of
City Planning,
San Francisco



**PLANNING CODE HEIGHT AND BULK DISTRICTS
EFFECTIVE MAY 24, 1987**

SOURCE: Department of
City Planning,
San Francisco

B. URBAN DESIGN AND SITE VISIBILITY

URBAN DESIGN

- The project block, Assessor's Block 195, is bounded by Jackson, Montgomery, Washington, and Kearny Streets, and diagonally divided by Columbus Avenue into two triangular portions. Most of the project site is vacant, including A-Site and about one-third of B-Site. The two-story Colombo Building is located on B-Site. This building is of the Classical Revival style with a concrete facade and a wide horizontal string course to divide the stories (see Historical/Architectural Resources, p. 52 for a full description of the Colombo Building). The pattern of building heights and styles is typical of the area and creates much of its character (see Figure 17, p. 46).

Both east and west portions of the project block contain a variety of small- and medium-scaled buildings, and include examples of the Italianate and period Revival styles. Of note is the three-story triangular-shaped Italianate style Transamerica

- Building, City Landmark No. 52, on the east side of Columbus Avenue.

The project block is situated in an area where lower-scale development of the older North Beach, Chinatown, and Jackson Square communities abuts the high-rise development of the Financial District. To the north, east and west of the site, building heights range from two to eight stories. The seven-story Columbus Tower on the southern corner of Kearny Street and Columbus Avenue was completed in 1907 as one of the last Flatiron style structures constructed in the city.

To the east is the Jackson Square Historic District, roughly bounded by Broadway on the north, Sansome Street on the east, Columbus Avenue on the west, and Washington Street on the south. Within the historic district, "standard brick masonry is predominant, both exposed and painted."/1/ "About one-fourth of the buildings in the district precede 1890; between 1890 and about 1912 there were a number of constructions, particularly after the 1906 disaster, which continued or echoed the typical style and scale of earlier years."/1/

Washington Street forms the northern boundary of the Financial District. High-rise towers constructed south of Washington Street in the past 25 years contrast in both design and scale with remaining older, low-rise structures. Blocks south of the sites are

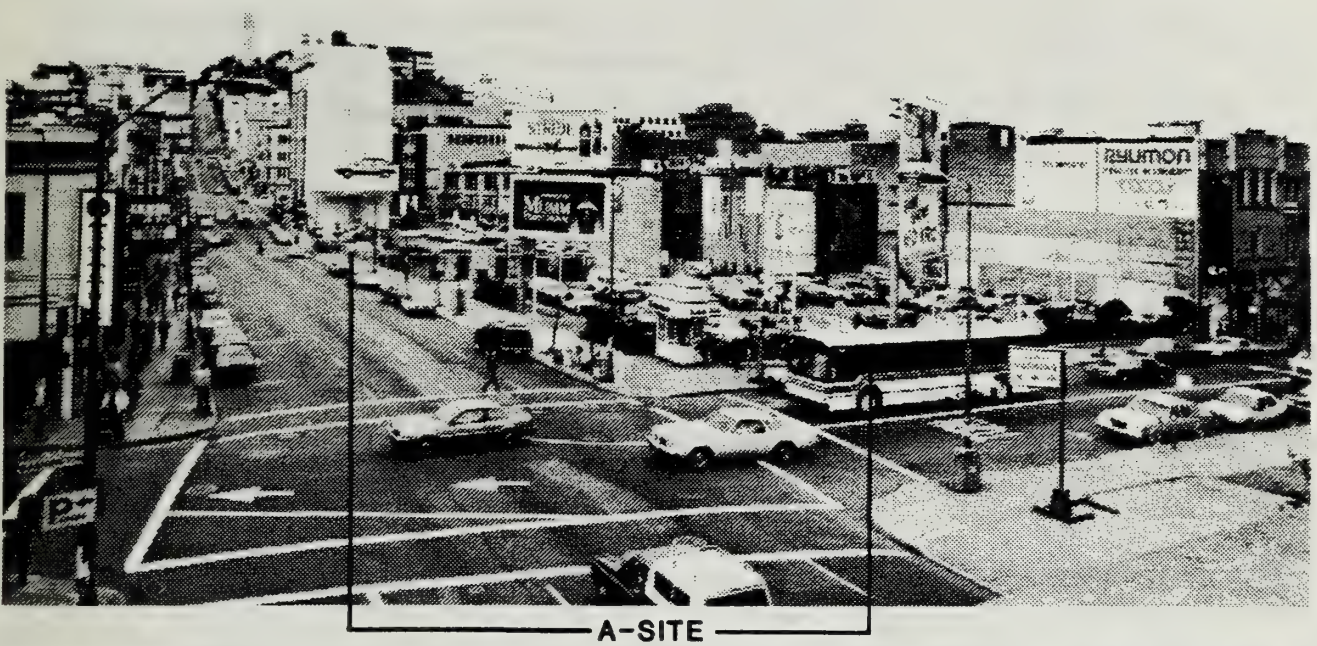


FIGURE 17
PHOTOGRAPHS
OF PROJECT SITES

SOURCE: ESA

- occupied by high-rises exceeding 20 stories, including the 300-ft.-tall Montgomery / Washington building and the 300-ft.-tall Holiday Inn across Washington Street from B-Site. The 850-ft.-tall Transamerica Pyramid Building, the tallest building in San Francisco, is located diagonally across Montgomery Street from B-Site. The Colombo Building, together with the old Transamerica Building have traditionally marked the entrance to the North Beach district.

There is a sharp visual contrast between the high-rise buildings south of the project block and the low-rise development to the north (see Figure 17A on p. 47a).

Open spaces in the area are Portsmouth Square on Kearny Street (one-half block southwest of the sites) and the Transamerica Pyramid's Redwood Park (one block southeast of the sites).

SITE VISIBILITY

Views north and west of the two sites are characterized by low-rise retail and office buildings. The higher ground of Telegraph Hill terminates the view to the north. Views south and east from the sites are blocked by newer high-rise buildings. Long-range views of San Francisco Bay or other recognized landmarks are not available from either project site. The project sites are not visible from long-range view points to the west and south (Twin Peaks and Potrero Hill) because of intervening high-rise structures. The project sites are generally not visible from Nob Hill and Telegraph Hill because of intervening structures. The existing site structure (Colombo Building) is generally not visible from locations beyond the buildings and streets in the immediate project vicinity. (Views of the project site are shown in Figures 18 and 19, pp. 48 and 49.)

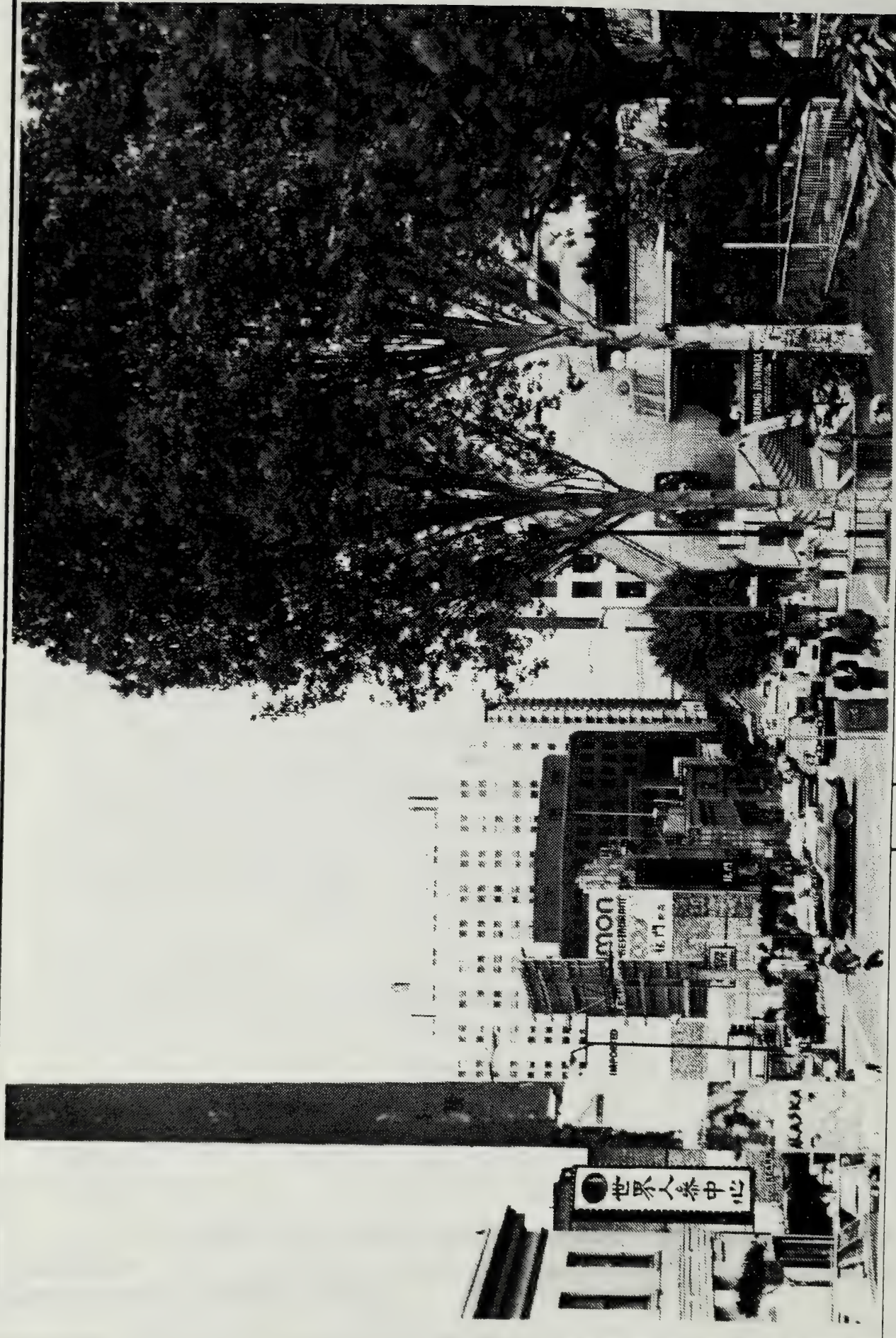
NOTE - Urban Design

/1/ Landmarks Preservation Advisory Board, Case Report, Jackson Square Historic District.

C. SHADOW AND WIND

SHADOW

A-Site is currently vacant; therefore, there are no shadows cast from this site. Prior to 1979, the I-Hotel would have cast shadow mainly on adjacent streets and sidewalks. The



B-SITE

FIGURE 18
VIEW OF B-SITE FROM
WEST OF KEARNY/WASHINGTON INTERSECTION

SOURCE: ESA

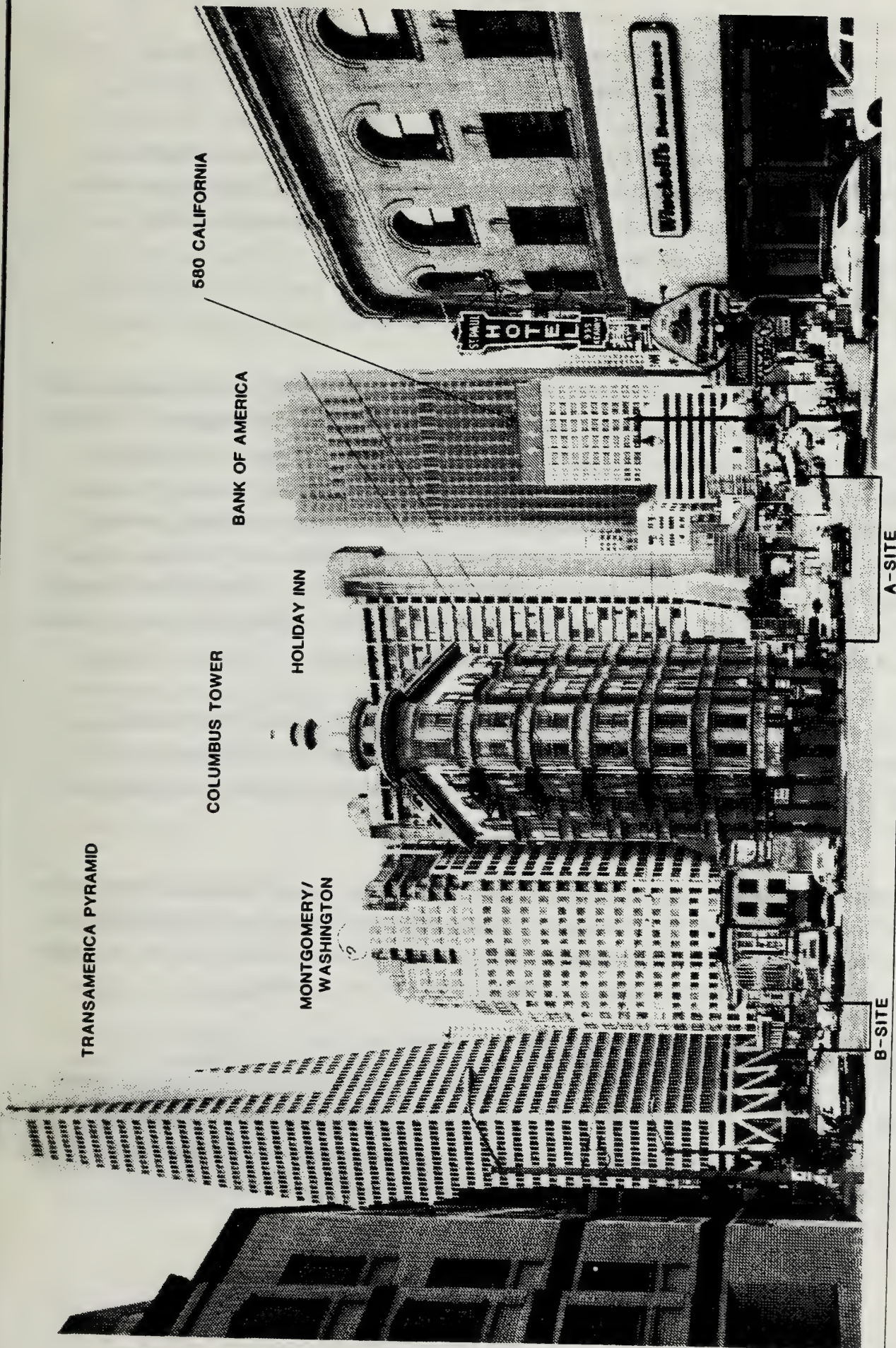


FIGURE 19
VIEW OF A- AND B-SITES
FROM COLUMBUS/KEARNY INTERSECTION

SOURCE: ESA

two-story Colombo Building casts shadows on surrounding streets and sidewalks north of the intersection of Columbus Avenue and Washington Street.

The closest property under the jurisdiction of the Recreation and Park Commission is Portsmouth Square located one-half block southwest of the sites. Existing and project shadow patterns for various times of the day and year are discussed in detail in Chapter IV, Environmental Impact, pp. 81, and 92 to 99.

WIND

U.S. Weather Bureau data show that westerly (i.e. from the west) to northwesterly winds are the most frequent and strongest winds during all seasons in San Francisco./1/ Of the 16 primary wind directions measured at the Weather Bureau station (at a height of 132 ft.), four directions comprise the greatest frequency of occurrence as well as the majority of strong wind occurrences. These are northwest, west-northwest, west and west-southwest, with occurrence rates of about 10%, 14%, 35%, and 2%, respectively, of the time between the hours of 6:00 a.m. to 8:00 p.m. throughout the year. The remaining 12 wind directions comprise the remaining 36% frequency of annual occurrence with lower wind speeds. Calm conditions occur two percent of the time.

Average wind speeds are highest during summer and lowest during winter months. However, strongest peak winds occur in winter, when speeds of 47 mph have been recorded./2/ The highest average wind speeds are in the mid-afternoon, and the lowest are in the early morning.

Between the hours of 7:00 a.m. and 6:00 p.m. on an annual basis, wind speeds measured at the Weather Bureau station exceeded 21, 25, 21, and 18 miles per hour (mph) 10% of the time for northwest, west-northwest, west, and west-southwest winds, respectively, while the 12 remaining wind directions exceeded 15 mph 10% of the time.

Pedestrian Comfort and Wind Criteria

Wind conditions partly determine pedestrian comfort on sidewalks and in other public areas. In downtown areas, high-rise buildings can redirect wind flows around buildings and divert winds downward to street level; each can result in increased wind speed and turbulence at street level.

III. Environmental Setting

The comfort of pedestrians varies under different conditions of sun exposure, temperature, clothing, and wind speed. Winds up to four mph have no noticeable effect on pedestrian comfort. With winds from four to eight mph, wind is felt on the face. Winds from 8 to 13 mph will disturb hair, cause clothing to flap, and extend a light flag mounted on a pole. For winds from 19 to 26 mph, the force of the wind will be felt on the body. With 26 mph to 34 mph winds, umbrellas are used with difficulty, hair is blown straight, there is difficulty in walking steadily, and wind noise is unpleasant. Winds over 34 mph increase difficulty with balance and gusts can blow people over./3/

In order to provide a comfortable wind environment for people in the Downtown, Section 148 of the Planning Code establishes an equivalent (includes the effects of turbulence) windspeed (as defined in the code) of seven and 11 mph as comfort criteria and 26 mph as a wind hazard criterion. Section 148 sets comfort levels of seven mph equivalent wind speed for public seating areas and 11 mph equivalent wind speed for areas of substantial pedestrian use. New buildings and additions to buildings may not cause ground level winds that would exceed these levels more than 10% of the time year round between 7:00 a.m. and 6:00 p.m. year round./4/ If existing wind conditions exceed the comfort level, new buildings and additions shall be designed to reduce ambient wind speeds to meet the requirements. No building or addition that would cause wind speeds to exceed the 26 mph hazard level for more than a single hour of any year would be permitted. Section 148 applies to the C-3 (Downtown Commercial) district. The site is not in the C-3 district. The project has, however, been tested and evaluated using the criteria established in Section 148.

Existing and project-generated wind conditions are discussed in detail in Chapter IV, Environmental Impact, p. 98 and Appendix B, p. A-39.

NOTES - Shadow and Wind

/1/ The U.S. Weather bureau data used in this analysis were originally gathered at the weather station atop the old Federal building at 50 United Nations Plaza during the years 1945-50. Data were taken hourly, annually for 16 wind directions. The data base, comprising of 32,795 hourly observations, is of sufficient length to provide a reliable estimate of future climatic conditions in San Francisco.

/2/ E. Jan Null, Climate of San Francisco, NOAA Technical Memorandum, NWS WR-126, February 1978.

/3/ Lawson, T.V., and A.D. Penwarden, 1976, "The Effects of Wind on People in the Vicinity of Buildings," Proceedings of the Fourth International Conference on Wind Effects on Buildings and Structures, London, 1975, Cambridge University Press, Cambridge, U.K., 605-622.

/4/ Section 148 of the Planning Code specifies the hours of 7:00 a.m. to 6:00 p.m. The available weather data that include that interval cover the hours of 6:00 a.m. to 8:00 p.m. Thus, observation from two additional evening hours and one additional morning hour are included in these data. Because, in general, winds are stronger in the afternoon and evening than in the morning, this approximation is conservative - it is likely to overestimate the existing and projected wind speeds.

D. HISTORICAL, ARCHITECTURAL AND CULTURAL RESOURCES

HISTORICAL/ARCHITECTURAL RESOURCES

The San Francisco Department of City Planning conducted a citywide inventory of architecturally significant buildings in 1976. In the 1976 Department of City Planning Architectural Inventory, approximately ten percent of the City's entire stock of buildings were awarded a rating for architectural merit ranging from a low of "0" to a high of "5". The total number of buildings which were rated from "3" to "5" represent less than two percent of the City's entire building stock.

The Jackson Square Historic District is located east of the project block; it is bounded on the west by Columbus Avenue, on the east by Sansome Street, and on the south by Washington Street, and extends nearly as far as Broadway on the north. The Jackson Square Historic District was placed on the National Register of Historic Places on November 18, 1971.

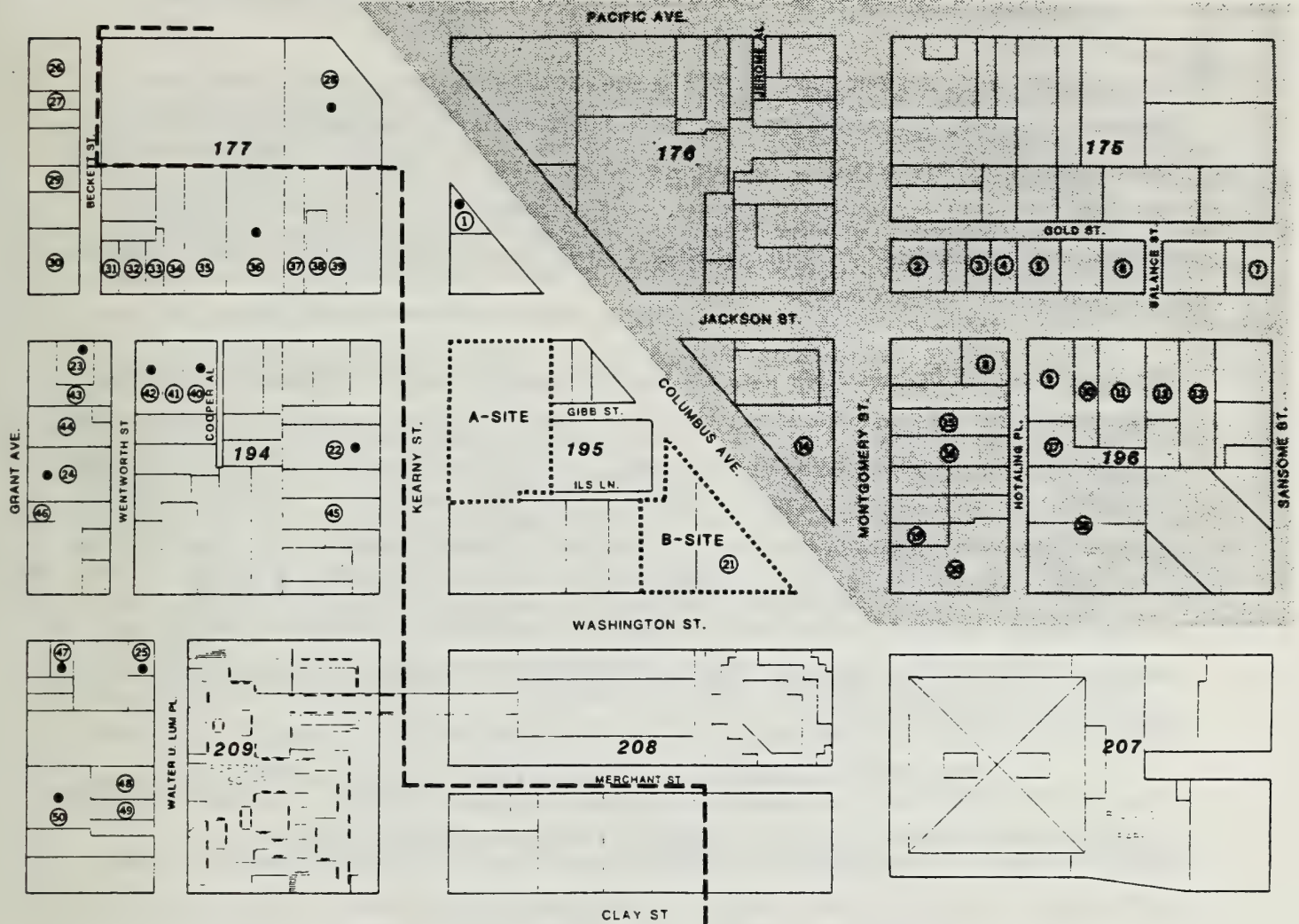
About 15 buildings within a one-block radius of the project site are rated on the 1976 Department of City Planning Architectural Inventory. Seventeen nearby buildings are City Landmarks. The project block and the areas north of Washington Street as far as Broadway were included in the Foundation for San Francisco's Architectural Heritage extended survey completed in 1985 (the survey has not yet been published). Jackson Square was surveyed by the Department of City Planning in 1970. Chinatown was surveyed by the Department of City Planning in 1985. North Beach was surveyed by Anne Bloomfield in 1982. For a description of the surveys, and the City Inventory and Heritage list and rating systems, see Appendix C, p. A-43.

- On October 16, 1985, the Landmarks Preservation Advisory Board (LPAB) considered a proposal (prepared by Patrick McGrew, LPAB President) for a Chinatown Historic District, extending from Bush to Broadway along either side of Grant Avenue. The Board of Supervisors initiated the designation of a Chinatown Historic District with the same boundaries (Resolution 979-85, effective November 15, 1985), and referred the matter to
- the LPAB and City Planning Commission for consideration. On December 4, 1985, the LPAB considered an expanded Chinatown Historic District. The boundary of this proposed district is shown on Figure 20, p. 54. The boundary of the expanded proposal extends to Kearny Street between Merchant Street and midway between Pacific and Jackson Streets
 - to include the lots across Kearny Street from the project block (A-Site). The district was approved by the LPAB and is currently pending before the City Planning Commission.
 - Figure 20 indicates the designated Jackson Square Historical District, and identifies those buildings in the project area which are City landmarks and those buildings rated 3 or above in the 1976 Department of City Planning Architectural Inventory, or in the expanded Heritage Survey.



- The Colombo Building is the only structure on the project sites. The building was rated "3" in the 1976 Department of City Planning Architectural Inventory, and was recommended by a unanimous vote of the Landmarks Preservation Advisory Board for San Francisco City Landmark Status in May, 1984. The Planning Commission tabled action on this recommendation in June, 1984. Because of the survey boundary lines, the Colombo Building was not included in the City's List of Architecturally and/or Historically
- Important Buildings in the Downtown. It was rated B* by Heritage in its extended survey. The B* rating was given to the Colombo Building because of the alterations to the structure which affects its integrity; B* means if these alterations were reversed or removed the building would be rated A by Heritage.

The North Beach Historical Survey identified the Colombo Building as an important visual and historical landmark when considered with the old Transamerica building across the street (the North Beach survey did not rank structures with a letter or number system rather, it discusses and describes the buildings of North Beach qualitatively). According to the survey, the Colombo building along with the Old Transamerica building serve as the gateway to Columbus Avenue and North Beach; the Colombo building is a major contribution in defining the intersection which serves as a transition point to North Beach, Jackson Square, the Financial District and Chinatown.

The two-story Colombo Building was designed by the Reid Brothers, noted turn-of-the-century San Francisco architects. James and Merritt Reid often used innovative and progressive construction details in buildings of their design, which include the Fairmont Hotel, constructed in 1906 at California and Mason Streets; the Hale Brothers Department Store (now Walgreen's) on Market Street near Sixth Street, originally constructed in 1902 and rebuilt in 1907; the Call Building, built in 1914 at New Montgomery and Jessie Streets; and the California Pacific building at Montgomery and Sutter Streets, which dates from 1910./2/



LANDMARK NO. AND EFFECTIVE DATE			S.F. DCP INVENTORY		HERITAGE	HERITAGE	
1. COLUMBUS TOWER (SENTINEL BLDG.)	33	6/70	5		A	26. 1056-66 GRANT AVE.	C
2. 800-804 MONTGOMERY ST.	26	3/70	4			27. 1050 GRANT AVE.	C
3. 470 JACKSON ST.	22	3/70				28. 935-51 KEARNY ST.	C
4. 472 JACKSON ST.	23	3/70	4			29. 1024-26 GRANT AVE.	C
5. 458-60 JACKSON ST.	25	3/70				30. 1000-22 GRANT AVE.	C
6. 432 JACKSON ST.	24	3/70	3			31. 670 JACKSON ST.	C
7. 400 JACKSON ST.	27	3/70	2			32. 662 JACKSON ST.	C
8. 473 JACKSON ST.	20	3/69	5			33. 656 JACKSON ST.	C
9. 451 JACKSON ST.	12	2/69	5			34. 650 JACKSON ST.	C
10. 445 JACKSON ST.	13	2/69	5			35. 640 JACKSON ST.	C
11. 441 JACKSON ST.	14	2/69	4			36. 626-36 JACKSON ST.	B
12. 415-31 JACKSON ST.	15	2/69	4			37. 622 JACKSON ST.	C
13. 407 JACKSON ST.	16	2/69	1			38. 614 JACKSON ST.	C
14. TRANSAMERICA BLDG. (4 COLUMBUS AVE.)	52	3/73	4			39. 608 JACKSON ST.	C
15. 728-30 MONTGOMERY ST.	10	2/69	3			40. 645-49 JACKSON ST.	B
16. BELL BLDG. (722 MONTGOMERY ST.)	9	2/69	4			41. 655-57 JACKSON ST.	C
17. 32-42 HOTALING PL.	11	2/69	5			42. 661-65 JACKSON ST.	B
18. 580 WASHINGTON ST.			3			43. 952-66 GRANT AVE.	C
19. 710 MONTGOMERY ST.			3			44. 940-50 GRANT AVE.	C
20. 700 MONTGOMERY ST.			3			45. 825 KEARNY ST.	A/B
21. COLOMBO BLDG. (1 COLUMBUS AVE.)			3		B	46. 918-20 GRANT AVE.	B
22. 833 KEARNY ST.			3		B	47. 743 WASHINGTON ST.	A
23. 675 JACKSON ST.			3			48. 21 WALTER LUM (BRENHAM) PL.	B
24. 930 GRANT AVE.			3		B	49. 17-19 WALTER LUM (BRENHAM) PL.	B
25. 743 WASHINGTON ST.			3		C	50. 824-32 GRANT AVE.	A

 JACKSON SQUARE HISTORIC DISTRICT
 STRUCTURES ON THE LIST OF
 SIGNIFICANT BUILDINGS IN CHINATOWN
 (1985 CHINATOWN SURVEY)
 BOUNDARY OF PROPOSED CHINATOWN
 HISTORIC DISTRICT
207 BLOCK NUMBER
 NOTE: See Appendix C for a discussion
 of surveys and rating.



• FIGURE 20
 ARCHITECTURALLY SIGNIFICANT BUILDINGS
 IN PROJECT VICINITY

The Colombo Building was built in 1913 in the Classical Revival style for Mrs. Elise Drexler. It is the only known structure in North Beach to be designed by architects of the Reids' stature. Early occupants of the reinforced-concrete building included E. Jacopelli and Sons, auto dealers; Italian-American Realty; Caesar Podoni and Co., an insurance agency; and Joe Valvo, a barber. The building reflected the settlement of North Beach as a predominantly Italian neighborhood./3/

The Colombo Building occupies the gore corner opposite the old Transamerica Building across Columbus Avenue. A wide string course (continuous horizontal band) separates the two stories into two different orders (styles). The first level is supported by columns and pilasters of the Ionic Order; pilasters separating the sash windows at the upper level are of the Doric Order. The symmetrical composition is sparsely ornamented, topped with a plain frieze and cornice. Several modifications have been made to the building: the corner rotunda on the first floor was stuccoed over and filled in with glass blocks, and some of the windows on the upper floor were replaced with modern aluminum-frame windows (see Figure 18, p. 48).

Prior to 1979, the I-Hotel was located on the northern lot of A-Site. The hotel was listed on the National Register of Historic Places. It was demolished in 1979.

CULTURAL RESOURCES/4/

Prehistoric Setting

Research shows that no prehistoric (ca 8000 B.C.-1776 A.D.) sites or other cultural resources have been recorded as existing anywhere in the immediate vicinity of the project sites. It is possible that resources may be found on or near the project sites. The closest known site dating from this period is located on the south side of Harrison Street, west of Third Street.

Historical Setting

B-site is situated on what was once the shoreline of Yerba Buena Cove (now Montgomery Street). Archival research suggests that Native American Indians lived nearby and frequented the project area. There is record of a sweathouse or Temescal located at

the southwest corner of Montgomery and Sacramento Streets until 1842. William A. Richardson, founder of the town Yerba Buena (renamed San Francisco in 1835), was known to have worked in this area and employed local Native Indians. This suggests the possibility of a native settlement in the area, although there is no recorded evidence. Any associated aboriginal remains in the immediate vicinity could, in all likelihood, also date from this period. Such remains would be among the earliest historic period archaeological traces in San Francisco and would be of considerable significance.

The project sites have been near the heart of San Francisco's development since the city's colonial days, and it is likely that potentially significant cultural resources from several historic eras exist within the confines of both A- and B-Sites. The first structure on the subject block was erected about 1839. Other structures soon followed. By 1848, the block had become an integral component of the center of San Francisco.

The project area was near the center of events in San Francisco during the Gold Rush. During this era, many structures were built on the project block, only to be destroyed by one or more of the great fires that ravaged the area between 1849 and 1851.

From 1854 onward, the original International Hotel, at the southeastern corner of Jackson and Kearny Streets, occupied the greater part of A-Site. This structure was enlarged on one or more occasions between the early 1860s and 1887. The original I-Hotel was destroyed in the 1906 fire; it was rebuilt by 1907. Throughout the 1850s and '60s, a variety of commercial ventures, including Thomas Maguire's Opera House, was in operation on the north side of Washington Street, west of Montgomery, within the boundaries of B-Site.

During the City Building (1858-1886) and Late Nineteenth Century (1887-1906) periods, the project sites were occupied by numerous, multi-story commercial buildings of brick construction. Prior to 1979, the I-Hotel provided low-income housing to mostly Asian, particularly Philipino, elderly tenants. The project sites are in an area formerly referred to as "Manilatown" because of the large number of Philipinos who lived in the vicinity. Although there are still some Philipino residents in the area, Manilatown no longer exists as a distinct area.

In summary, the history of the project area is, in many respects, a microcosm of economic and commercial development of San Francisco from pre-Gold Rush times until after the Great Earthquake and Fire of 1906.

Site Condition

The site condition at the time of the Spanish-Mexican period consisted of sand dunes. Since the mid-1850s, filling has occurred on all of the project half-block, leaving the sites from six to 28 feet above the established city base (6.7 ft. above the ordinary high tide mark).

Artifacts of consequence from the Gold Rush era typically found at similar San Francisco sites (e.g., 505 Montgomery Street, two blocks south of the project block) include architectural remnants and privies, and have served to expand the historic record of the people and events of that era.

NOTES - Historical, Architectural and Cultural Resources

- /1/ Jean Kortum, Member of the landmark Preservation Advisory Board, past director of the North Beach Historical Project Inc., which prepared North Beach San Francisco: An Architectural, Historical, and Cultural Survey, June 30, 1982, and Anne Bloomfield, co-author of the North Beach Survey, June 30, 1982, telephone conversations, April 20, 1987.

/2/ Splendid Survivors, Charles Hall Page & Associates, Inc., for the Foundation for San Francisco's Architectural Heritage, 1979.

/3/ Landmark Preservation Advisory Board, Case Report.

/4/ Allen G. Pastron, Ph.D., of Archeo-Tec, consulting archaeologists, conducted archival research for both project sites and the surrounding area. The ensuing report, entitled Cultural Resources Evaluation of the Pan Magna Plaza Development Project, San Francisco, California, June 1985, is on file at the Department of City Planning, Office of Environmental Review, 450 McAllister Street. The report's findings and recommendations regarding the proposed project are summarized here.

E. TRANSPORTATION

The site is served by local streets and by portions of the regional freeway system (see Figure 1, p. 16). Access to the freeways connecting with the East Bay, Peninsula and portions of southeast and southwest San Francisco is provided by pairs of ramps about 1,500 ft. to the northeast (Broadway at Sansome and Battery Streets) and about 2,000 ft. to the east (Washington and Clay Streets at Davis Street).

In the vicinity of the project site, Columbus Avenue and Kearny Street are designated as Transit Preferential Streets on which priority is given to transit vehicles over autos during commute and business hours on weekdays./1/ Columbus Avenue, Washington Street and Kearny Street are designated as Primary Vehicular Streets, which the Master Plan defines as "major routes for automobile and truck movements into and out of the Downtown

area." Kearny Street carries traffic northbound in three lanes, while Jackson Street is one-way eastbound and Washington Street is one-way westbound, each providing one lane of traffic. Columbus Avenue is two-way and carries two lanes of traffic in each direction.

The site is served by San Francisco Municipal Railway (Muni) electric trolley and motor coach lines, as well as indirectly by Muni Metro light-rail vehicles on Market Street, one-half mile south of the site. Muni routes and bus stops in the vicinity of the site are shown in Figure 34, p. 106. Table 5, p. 114 summarizes existing p.m. peak-hour and peak-period (4:00 to 6:00 p.m.) ridership and operating conditions for the transit agencies that serve the downtown.

Regional transit service to the site is provided to and from the East Bay by BART at the Montgomery Street Station on Market Street, and by AC Transit motor coaches at the Transbay Terminal.

Service to the Peninsula is provided by CalTrans through a service contract with the Southern Pacific Transportation Company (SPRR) from a train terminal at Fourth and Townsend Streets; by the San Mateo County Transit District (SamTrans) from a bus stop on Columbus Avenue at Jackson Street; and by BART, which provides transfers to SamTrans routes at the Daly City BART Station.

The Golden Gate Bridge, Highway and Transportation District (Golden Gate Transit) provides a.m. and p.m. peak-period bus service to Marin and Sonoma Counties from stops on Sansome and Battery Streets and at the Transbay Terminal. Golden Gate Transit provides ferry service to terminals in Larkspur and Sausalito from the Ferry Building.

Golden Gate Transit also operates a vanpool and club (subscription) bus program to areas not served by fixed routes. The RIDES carpool program, operating as a nonprofit, publicly funded corporation, provides consulting and matching services to help establish Bay Area carpools and vanpools. There are about 600 carpools on the Golden Gate Bridge during the a.m. peak hour, carrying about 2,200 people daily (average occupancy of 3.7 persons per carpool vehicle).^{2/} The Bay Bridge has about 2,700 carpools during the a.m. peak hour, carrying about 10,500 people daily (an average occupancy of 3.9 persons per carpool vehicle).^{3/}

Pedestrian activity in downtown San Francisco and around the site during the peak periods of 7:00 to 9:00 a.m. and 4:00 to 6:00 p.m. is directed primarily to and from transit and parking facilities. Peak afternoon pedestrian flows are generally more intense than those of the morning period. Noon-hour flows are more intense than the afternoon flows and are directed primarily to restaurants and retail stores within the downtown area.

Sidewalk widths on Washington, Kearny and Jackson Streets and Columbus Avenue are restricted by parking meters, fire hydrants, trashcans and poles. The effective clear width of the Jackson Street sidewalk is 5.6 ft., about 67% of the full width of 8.3 ft. The effective clear width of the Kearny Street sidewalk is 9.5 ft., about 76% of the full width of 12.5 ft. The effective clear width of the Columbus Avenue sidewalk is 7.3 ft., about 72% of the full width of 10.2 ft. The effective clear width of the Washington Street sidewalk is 6.8 ft., about 68% of the full width of 10 ft.

Sidewalks and crosswalks fronting the project site operate in "Unimpeded" conditions during the noon hour, with the exception of the crosswalk across Washington Street at Columbus Avenue, which operates in "Impeded" conditions during the noon hour. (Table D-2, Appendix D, p. A-49, shows the relationship between flow categories, walking speeds and interactions among pedestrians.) Operations of sidewalks and crosswalks fronting the project site during the peak afternoon period are in the Open and Unimpeded range.

The project block is located one block from the Downtown Core - Automobile Control Area (the northern boundary of which runs along Clay Street, the eastern boundary about one-half block west of Kearny Street) and immediately adjacent to the Parking Belt (the northern boundary of which runs along Washington Street), as designated in the Downtown Transportation Plan of the Transportation Element of the San Francisco Master Plan.^{1/} Within the Downtown Core - Automobile Control Area, the Plan calls for reducing the number of private commuter vehicles. The Plan designates the Parking Belt as an appropriate area for short-term parking facilities to replace spaces removed from the core area. Both project sites are within the Washington-Broadway Special Use District No. 1 which excludes sites under 20,000 gross sq. ft. from the requirement for providing parking for any use other than dwellings.

The estimated parking demand (both long-term and short-term) from the C-3 District in 1984 was found to be about 45,300 spaces, which would occupy about 94% of the 48,000 parking spaces in and near the C-3 District.

A local parking survey conducted in 1981 indicates that the average, weekday occupancy rate of existing municipal and commercially available off-street parking within approximately one-half mile (or three to four blocks) of the project site is about 96%. (An occupancy rate of about 90% can be considered the functional capacity of a single parking facility./5/)

Parking demand and traffic in the Chinatown neighborhood differs from those in the Financial District in that a high demand for parking and heavy traffic volumes continue into the evening and on weekends, whereas parking demand and traffic flows in the Financial District are more concentrated during peak periods on week days. As the project site is located on the edge of the Chinatown neighborhood there could be heavy traffic volumes and a high demand for parking near the project site during non-weekday peak times.

NOTES - Transportation

/1/ San Francisco Department of City Planning, January 1983, Transportation, An Element of the Master Plan.

/2/ Kay McGill, Golden Gate Bridge, Highway and Transportation District, telephone conversation, May 13, 1982. Elysia Chan, Public Information Officer, RIDES for Bay Area Commuters, Inc., telephone conversation, May 13, 1982.

/3/ Traffic Survey Services MA-60, Bay Bridge, Metropolitan Transportation Commission, November 1983.

/4/ Based on observations and counts made by Environmental Science Associates, Inc., on Tuesday and Wednesday, May 21 and 22, 1985.

/5/ Montgomery-Washington Building, FEIR, 81.104E, certified January 28, 1982, page 41. Survey conducted by TJKM on January 20-23, and 26 and July 20-22, 1981.

F. AIR QUALITY

The Bay Area Air Quality Management District (BAAQMD) operates a regional monitoring network which measures the ambient concentrations of six air pollutants: ozone (O₃), carbon monoxide (CO), total suspended particulates (TSP), lead (Pb), nitrogen dioxide

(NO₂), and sulfur dioxide (SO₂). On the basis of the monitoring data, the Bay Area, including San Francisco, currently is designated a non-attainment area with respect to the federal ozone and CO standards. A four-year summary of the data collected at the BAAQMD monitoring station nearest the project sites (about 2.9 miles south at 900 23rd Street) is shown in Appendix F, p. A-58, together with the corresponding federal and/or state ambient air quality standards. In 1984, there was one violation of the state ozone standard, one violation of the federal and state eight-hour CO standards and five violations of the previous state 24-hour average TSP standard; in 1983 there was one violation of the federal and state one-hour average ozone standards and four violations of the previous state 24-hour average TSP standard; and in 1982 there was one violation of the federal and state eight-hour CO standard, and three violations of the state 24-hour average TSP standard./1/

BAAQMD has conducted several CO "hotspot" monitoring programs in the Bay Area, including two in San Francisco. One CO monitoring program was conducted during the winter of 1979-80 at the intersection of Washington and Battery Streets, about 0.2 miles east of the sites./2/ The high eight-hour average concentration was 10.1 ppm, which violates the 9-ppm state and federal standards by 1.1 ppm. The high one-hour average concentration of 15 ppm does not violate the 20-ppm state standard or the 35-ppm federal standard. Another CO monitoring program was conducted during the winter of 1980-81 at the intersection of Geary and Taylor Streets, about 0.7 miles southwest of the site, and at 100 Harrison Street, about 1.0 mile southeast of the site./3/ At Geary and Taylor, the observed high eight-hour average concentration was 11.5 ppm, which violates standards by 2.5 ppm, and the high one-hour average concentration was 15 ppm which does not violate the standards. At Harrison Street, the observed high eight-hour and one-hour average concentrations were 7.8 ppm and 13 ppm, respectively, which do not violate the standards. These data indicate that locations in San Francisco near streets with high traffic volumes and congested traffic flows may experience violations of the eight-hour CO standard during adverse meteorological conditions. In December 1985, the City monitored CO and counted traffic at the Sixth and Brannan intersection. These data are still being analyzed.

Comparison of these data with those from other BAAQMD monitoring stations indicate that San Francisco's air quality is among the least degraded of all the developed portions of the Bay Area. Three of the four prevailing winds, west and northwest, and

west-northwest blowing off the Pacific Ocean, reduce the potential for San Francisco to receive pollutants from elsewhere in the region.

San Francisco's air quality problems, primarily CO and TSP, are due largely to pollutant emissions from within the City. CO is a non-reactive pollutant with the one major source category being motor vehicles. CO concentrations are generally highest during periods of peak traffic congestion or adverse meteorology. TSP levels are relatively low near the coast, increase with distance inland, and peak in dry, sheltered valleys. The primary sources of TSP in San Francisco are demolition and construction activities, and motor vehicle travel over paved roads.

San Francisco contributes to regional air quality problems, including ozone, which affects other parts of the Bay Area. Ozone is not emitted directly from sources, but is produced in the atmosphere over time and distance through a complex series of photochemical reactions involving hydrocarbon (HC) and nitrogen oxide (NO_x) emissions, which are carried downwind as the photochemical reaction occurs. Ozone standards are violated most often in the Santa Clara, Livermore and Diablo Valleys, because local topography and meteorological conditions favor the buildup of ozone and its precursors there.

In 1982, emissions from motor vehicles were the source of 86% of the CO, 46% of the HC, 44% of the TSP, and 56% of the NO_x emitted in San Francisco, while power plant fuel combustion was the largest single source of sulfur oxides (SO_x), about 33% of the total./4/ These percentages are expected to apply reasonably well to current conditions.

In response to the Bay Area's ozone and CO non-attainment designations, the Association of Bay Area Governments (ABAG), BAAQMD, and the Metropolitan Transportation Commission (MTC) prepared and adopted the 1982 Bay Area Air Quality Plan, which establishes pollution control strategies to attain the federal ozone and CO standards by 1987, as required by federal law./5/ These strategies were developed on the basis of detailed subregional emission inventories and projections, and mathematical models of pollutant behavior, and consist of stationary and mobile source emission controls and transportation improvements. The BAAQMD, MTC, and California Bureau of Automotive Repair (a State agency) have primary responsibility for implementation of these strategies.

NOTES - Air Quality

/1/ State standards for particulate matter changed in 1983 to concentrate on fine particulate matter, which has been demonstrated to have health implications when

inhaled. Concentration standards have also changed. There is not yet an adopted method for monitoring fine particulate matter. Until the State adopts a method, it is not possible to determine what proportion of TSP in San Francisco would be subject to review against the new standards.

/2/ Association of Bay Area Governments (ABAG), AQMP Tech Memo 33, "Summary of 1979/80 CO Hotspot Monitoring Program," Berkeley, California, June 1980.

/3/ ABAG, AQMP Tech Memo 40, "Results of the 1980/81 Hotspot Monitoring Program for Carbon Monoxide," Berkeley, California, January 1982.

/4/ Bay Area Air Quality Management District (BAAQMD), "Base Year 1982 Emissions Inventory, Summary Report," San Francisco, California, November 1, 1983.

/5/ ABAG, BAAQMD and the Metropolitan Transportation Commission (MTC), 1982 Bay Area Air Quality Plan, Berkeley, California, December 1982.

G. EMPLOYMENT AND HOUSING

ON-SITE EMPLOYMENT

A-Site is currently vacant; until 1979, the I-Hotel and a smaller residential hotel occupied the site. A portion of B-Site is occupied by the Colombo Building, which has ground-floor retail with office above; there are currently 35 employees in the Colombo Building./1/

SAN FRANCISCO AND REGIONAL EMPLOYMENT

Downtown Office Growth

Although the project sites are not within the C-3 District, they are immediately adjacent to it and as such are subject to development pressures similar to those within the C-3 District. San Francisco is the major office center in the Bay Area, with approximately 62.1 million sq. ft. in 1984./2/ During the 1970s, space in downtown office buildings was added at a rate of about 1.5 million gross sq. ft. per year. Between 1980 and 1983, space was added at an average rate of about 2.7 million gross sq. ft. per year. Approximately 36.1 million gross sq. ft. of net new office space was constructed between 1960 and 1983. Office space projections in the Downtown Plan EIR indicate that the C-3 district would contain about 70.5 million gross sq. ft. of office space by 1990, and 78.9 million gross sq. ft. of office space by 2000./3/

Commercial Rental Market in Chinatown

Office space in Chinatown comprises 24% of all space used by major commercial activities in Chinatown; employees in this office space represent about 23% of all jobs held in major categories within Chinatown./4/ Rents for ground floor retail space have risen; the vacancy rate for such space is low.

Vacancy Rates and Commercial Rents

On the basis of a 1984 citywide survey of 315 office buildings, the San Francisco Building Owners and Managers Association (BOMA) reported a citywide vacancy rate of 6.8%./5/ This rate is a decrease from the 7.1% rate reported by BOMA in its October 1983 survey and an increase over the 3.7% rate reported in its 1982 survey and the 1.04% rate reported in its 1981 survey. According to a September 1985 Coldwell Banker survey, the vacancy rate in downtown San Francisco office buildings (new, existing and major renovations) was 12.4%./6/ The 12.4% rate is an increase from 11.8% reported in June 1985, the 10.9% reported in March 1985, the 9% reported in September 1984, and the 6.1% rate of June 1983 (earlier Coldwell Banker surveys). The vacancy rate for September 1985 is the highest that has been reported for San Francisco since Coldwell Banker started this survey in 1978; it is the eighth lowest of the 33 major downtown financial districts surveyed by Coldwell Banker. For comparison, the September 1985 office vacancy rate was 16.5% nationally; 9.4% in Chicago; 17.8% in Dallas; 10% in downtown Manhattan, and 21.2% in San Jose./6/ Vacancy rates reported by both BOMA and Coldwell Banker in 1981 were about one percent.

The surveys indicate a general trend of increasing vacancy rates for downtown San Francisco office buildings over the last four years. This increase is the result of several factors, including an increase in the amount of available office space (new space being completed and space available for sublease), a decrease in the demand for office space, and the nationwide economic recession. New construction now in progress is expected to add further to the current oversupply./6/

There has been a concurrent demand for and development of office space elsewhere in the Bay Area, as well as increasing vacancy rates in those areas experiencing large amounts of office development. Some businesses have moved their clerical, support and production

departments to outlying areas while maintaining headquarters and main branch offices in San Francisco. In particular, the City of Oakland, and San Mateo and Contra Costa Counties experienced increased demand for office space. For example, about 17 million sq. ft. of office space was proposed or under construction along the U.S. 101 corridor in San Mateo County in 1981./7/ Projects were included which are in various stages of public review and not all may be approved or built.

As a result of demand and increasing operating costs in San Francisco, land prices, construction costs, interest rates and annual rents for office space in the downtown financial district have more than tripled in the last decade, from \$8.50 per sq. ft. in 1970 to approximately \$30 per sq. ft. in 1981./8/ New buildings are able to charge the highest rents, while rents in older buildings in the financial district and South of Market are less expensive (averaging approximately \$15 per sq. ft. less than in new buildings); rents average between \$15 and \$20 per sq. ft. South of Market and between \$20 and \$24 per sq. ft. North of Market./9,10/ The rents for new office space in San Francisco (\$28 to \$42) are about 12% to 110% higher than commercial rents in Oakland (\$20 to \$25 per sq. ft.); 17% to 133% higher than those on the Peninsula (\$18 to \$24 per sq. ft.); and about 4% to 163% higher than those in Contra Costa (\$16 to \$27 per sq. ft.)./11/ Higher vacancy rates would be expected to decrease the pressure for higher commercial office rents in San Francisco. The rising vacancy rates discussed on p. 65 have been (and could continue to be) beneficial to lessees of office space by both lowering rents and increasing business choices for size, layout and location of office space.

SAN FRANCISCO AND BAY AREA HOUSING MARKET

Housing Market Context

Since the early 1970s, housing prices and rents have increased dramatically in San Francisco and throughout the Bay Area. Demand for housing has been strong and supply has not kept pace with demand in many areas. In addition, in the early 1980s there were major changes in financial markets which substantially increased the cost of money for housing. Many different factors contribute to the current housing market situation. These include demographic and household characteristics, household incomes, lifestyle preferences, employment growth, the attractiveness of the Bay Area as a place to live, the availability and cost of financing, the attractiveness of real estate as an investment, the

implications of Proposition 13 for the costs of developing new housing, growth limitation policies in some communities, and the scarcity of land in other communities.

As a result of all of these factors, many households now allocate a greater share of their financial resources to housing, and the housing choices available at various prices and rents have changed. Many people cannot now afford the housing they prefer and many are not housed at the standard that, until recently, they had come to expect.

Housing Market Conditions in Chinatown

Since the late 1960s, Chinatown has experienced a steadily worsening housing problem. The community's housing stock has deteriorated due to age, deferred maintenance, and overcrowding. Between 1970 and 1985, the stock of housing units declined by 29% to 30% because of demolition and conversion to other uses. At the same time that the number of units has shrunk, the demand has actually increased, because of reforms in immigration laws that resulted in an upsurge of new families seeking affordable housing and the social services unique to Chinatown. However, between 1980 and the end of 1983, about 11% of the total number of housing units in the Chinatown area were rehabilitated through various private and public loan and grant programs. About seven percent of the total housing units in the Chinatown area are located in the Ping Yuen public housing project.

The once tightly knit neighborhood of people speaking the same Cantonese-related dialect has been infused with strangers speaking a multitude of tongues. Many Chinese from Vietnam arrived after the fall of Saigon in 1975 and, in recent years, more immigrants have come from Taiwan and mainland China. The social makeup of Chinatown has been changed but the attraction of newcomers to settle where culturally familiar goods and services are available remains strong. Nearly 40 social service organizations and several churches serve the residents' needs for housing and job assistance, immigration assistance, child care, legal aid, civil rights advocacy, mental health counseling, and services for the elderly and disabled.

Chinatown's population is older, poorer, less educated and more poorly housed than that in most of San Francisco. Approximately 75% of the Chinatown Census area population is foreign-born (compared to 25% citywide). More than half its residents speak little or no

English, and about 25% of all persons fall below the poverty level (vs. 14% citywide). The median household income in 1979 was reported to be \$10,100, about \$5,700 less than the citywide median./12/ Chinatown's typical household is not only aging but increasingly consists of just one person. In 1970, children 14 years of age or younger constituted 17% of the total population; by 1980, 14% of the total population was 16 years or younger. Between 1970 and 1980, single person households jumped from 55% to 66% of all housing units./12/

Built for a society of bachelor workers, Chinatown contains an estimated 3,850 residential hotel rooms, about 60% of the neighborhood's total housing units. Average rents of \$115 per month in 1984 reflect the typically small size of these rooms, often ten by ten feet with common bathrooms down the hall. Apartment buildings number about 2,750 and contain an average of 14 units. As with residential hotel rooms, units are small in size. Residential space is spread throughout the Chinatown neighborhood, with most units situated above commercial space./13/

Chinatown's housing stock is largely masonry buildings over forty years old and thus not constructed to current seismic safety standards./14/ The City's Building Code requires structural reinforcement of buildings undergoing conversion of use; there is no requirement for buildings in which the use does not change. Seismic reinforcement of older buildings typical of the area is estimated to cost about \$30 per sq. ft., about the same cost as new construction./15/

The relatively low cost of housing, in addition to the other social, economic and cultural characteristics of the neighborhood, make Chinatown a magnet for immigrants and low-income Chinese-Americans alike. Consequently, the demand for affordable housing is acute. In the early 1970's, a housing study by the City Planning Department identified a need for 1,950 rehabilitated units and 2,300 new units over a 10-year period./16/ Some 360 units have been brought onto the market since that study. Five thousand people applied for the 185-unit Mei Lun Yuen housing project alone,/17/ and between 1,200 and 1,800 new immigrants are seeking housing every year in Chinatown./18/

More housing units have been taken off the housing market, demolished or converted from housing use than have been added to the housing stock. The actual number is not known; U.S. Census figures, City Planning statistics, and actual conversion cases all indicate a steadily diminishing housing stock.

Between 1970 and 1980, almost 3,300 year-round housing units and 2,900 rental units were lost in the Chinatown-North Beach census tracts, including 1,700 year-round housing units in the three Chinatown core census tracts. The bulk of these units were residential hotel rooms./17/ "A Study of the Conversion and Demolition of Residential Hotel Units," prepared by the Department of City Planning in November 1980, found that, between 1975 and 1980, 731 residential hotel units were demolished, vacated or converted in the Chinatown North Beach Financial District area./17/

The loss of housing has assumed a variety of forms. Legal and illegal conversions to other uses have occurred. Some units have been demolished to make way for office development (including the three residential hotels on A- and B-Sites); and many have been kept vacant in anticipation of future commercial development. The Residential Hotel Conversion and Demolition Ordinance, adopted by the Board of Supervisors in 1981, allows conversions only if units are replaced, or a contribution of 40% of construction cost of replacement housing is made into a Hotel Preservation Fund. A moratorium directed against such conversions in the Chinatown-North Beach area (Ordinance 185-84) was adopted by the Board and signed into law in May 1984. The one-year moratorium has been extended and is currently in effect. However, illegal conversions and intentional vacancies have continued.

Housing Market Conditions in San Francisco

There is strong demand for San Francisco housing relative to the supply of housing in the City. Many households currently living elsewhere in the Bay Area would prefer to live in San Francisco, and many of those who move into the region also want to live in the City, including, for example, immigrants/refugees for whom San Francisco is a traditional entry point to the U.S. This demand is expected to continue.

Demand relative to supply is part of the explanation for the high housing prices and rents in the City. Despite high housing prices and rents, however, the private market continues to be unable to produce enough new housing to relieve these market pressures. This is because the costs of land, financing, and construction are high relative to the prices and rents that many households can afford. There is particular difficulty in producing rental housing, since residential rents, unlike for-sale housing prices, have not kept pace with rising construction and land costs or with inflation. Although the difficulties in

producing affordable housing arise from many factors and exist throughout the region, it is relatively more costly to produce housing in San Francisco than in many other parts of the region. The relatively high land costs and the lack of vacant land in San Francisco (as well as the resultant need to build at a higher density with associated higher construction costs) are responsible for the relatively high level of prices and rents needed to generate new residential development in the City.

The data substantiate this description of San Francisco's current housing market. Over the decade from 1970 to 1980, net additions to the City's housing stock totalled 6,200 units for an increase of two percent./19/ About 1,900 units were added from 1980 through 1982./20/ Most of the units added were for-sale housing. The low vacancy rate in San Francisco over this period reflects the low growth of the housing stock relative to the strength of demand. Data from the Federal Home Loan Bank show a housing vacancy rate of 1.0% for San Francisco in 1983. The rate has been below one percent and consistently the lowest among the nine counties of the Bay region since 1980./21/

The housing market context in San Francisco is defined by the characteristics of both the new and the existing housing stock. Overall, about one-third of the City's housing units continue to be owner-occupied and about two-thirds renter-occupied./22/ Market trend data based on appraisals indicate single-family housing value increases in the City of 8.5 percent per year compounded from 1970 to 1975 and over 20 percent per year compounded from 1975 to 1980. From 1980 to 1984, appreciation has slowed to about an annual compound rate of five percent, similar to the rate of increase from 1970 through 1973./23/ Among Bay Area counties, San Francisco has the largest percentage of rental units. Rents in San Francisco have increased; Census data indicate that median contract rent more than doubled from 1970 to 1980, at an annual compound growth rate of 7.6%./19/ The range of rents in San Francisco remains wider than in other parts of the region; the City has some of the most expensive rental housing in the region as well as some of the lowest-rent housing. This includes a relatively large stock of small rental units in old buildings that provides one of the few sources of housing for lower income households.

Incomes of City residents and of many of those who would want to live in San Francisco have not kept pace with increases in the costs of housing. During the 1970's, on average,

the incomes of San Francisco households increased by about 135% while housing costs overall increased by about 165%./24/ Thus, the percentage of income allocated to housing increased.

The percentage of income spent on housing is higher for lower-income households. The percentage declines as income increases. Across income categories, the percentage of income spent on housing is higher for renters than for owners. For example, Census data show that of the 31% of San Francisco households with incomes under \$10,000 in 1979, on average, the renters spent 48.6% of their income for housing and the owners spent 26.0% for housing. Of the 39% with 1979 incomes of \$20,000 or higher, the renters spent 15.7% of their income on housing while the owners spent 11.2%./25/

In the current housing market, there are incentives to upgrade existing housing. Those who cannot afford higher-priced neighborhoods are often attracted to other areas where housing can be secured at lower prices and investments made to upgrade the units. As this occurs, the desirability of the area improves, prices and rents rise, and many of the longer-term residents of the neighborhood (e.g. lower-income households, older people, and families, particularly those who have been renting) are eventually replaced by newcomers. This process (often called "gentrification") has occurred in areas of San Francisco. In recent years, preferences for central city neighborhoods and older housing, and an increase in the types of households with these preferences, have combined with overall market conditions to support upgrading of this type. In the process, the City's stock of housing in the lower price/rent range is reduced.

Regional Perspective on Housing Market Conditions

Most of the housing market conditions described above for San Francisco are applicable throughout the Bay Area. Increases in home prices and in interest rates during the past decade have raised the cost of ownership housing. As a result, many first-time homebuyers and new entrants into the region's housing market now have difficulty affording Bay Area housing. In the rental housing market, a large number of households also face an affordability problem. The lack of new construction, and continued strong demand support upward pressure on rents. Among renters, many lower-income households are faced with increasing difficulty securing affordable housing.

Although these conditions exist to some extent in other parts of the country, the Bay Area remains one of the most desirable places to live and has one of the most competitive housing markets in the nation. Because of the limited land area of San Francisco, the role of the City as employment center for the region, and the demographic characteristics of the City's population, the region's market conditions (in terms of supply, demand and price) are at their extreme in San Francisco.

Between 1970 and 1980, 436,200 housing units were added in the Bay Area. Most of the additions were in the East Bay and the Peninsula, each with about 40% of the total increase. The largest percentage increase in housing over the period occurred in the North Bay counties./19/

The shortage of supply relative to demand is evidenced in the vacancy rates for Bay Area counties. In 1983, the vacancy rate in each Bay Area county, with the exception of Solano County, was below two percent. The Solano County vacancy rate was 2.1%. This situation has persisted since 1980 in all counties except Solano County, where the vacancy rate has fluctuated from 1.7% to 3.1% between 1980 and 1983./21/

Market trend data on the value of single family residences in the Bay Area reflect the strong demand for housing in the region. Over the region as a whole, single-family housing values increased almost fourfold between 1973 and 1983; the annual rate of increases in value was about 14% per year, compounded. The pattern is similar among East Bay, South Bay and North Bay housing sub-markets. In San Francisco, the data indicate somewhat stronger demand and more pressure on existing units than the average for the region./26/

Residence Patterns of C-3 District Workforce/27/

Because the project is located at the edge of the C-3 District and because the office space would be similar to C-3 office uses, it is important to understand the project and its impacts in the context of the downtown office/commercial area.

Residence patterns describe the distribution of workers by where they live. Table 2 shows the residence patterns for C-3 District workers in 1984. Most of the estimated 286,000 C-3 District workers (159,000, or 56%) lived in San Francisco in 1984. The next largest group (73,000, or 26%) lived in the East Bay, fairly evenly divided between Alameda and

TABLE 2: RESIDENCE PATTERNS OF C-3 DISTRICT WORKERS, 1984

<u>County of Residence</u>	<u>Number of Workers</u>	<u>Percentage Distribution</u>
San Francisco	159,000	55%
East Bay	73,000	26%
Alameda	38,000	
Contra Costa	32,000	
Solano/Napa	3,000	
South Bay	35,000	12%
San Mateo	33,000	
Santa Clara	2,000	
North Bay	19,000	7%
Marin	17,000	
Sonoma	2,000	
TOTAL	286,000	100%

NOTE: The number of workers shown here includes permanent employment and on-site construction-period employment. The 1984 C-3 District employment estimates are based on economic analysis and forecasts of business activity and employment growth for the 1981 to 1990 period. The 1984 residence patterns are estimates based on demographic and housing analyses done for the 1981 to 1990 period. The basic data on the residence patterns of C-3 District workers were collected in the Downtown Plan EIR Employee Survey. (See Vol 1, pp. IV.D.1-IV.D.7 of the Downtown Plan EIR.) The residence patterns for building maintenance/security and construction workers (not covered by the Employee Survey) were approximated using the average percentage distribution for all other workers.

SOURCE: Downtown Plan EIR, Vol. 1, Table IV.D.11, pp. IV.D.37-IV.D.38.

Contra Costa Counties, with a relatively small number in Solano and Napa Counties. About 35,000 workers (12% of the total) lived in the South Bay, most in San Mateo County; and about 19,000 (7%) live in the North Bay, most in Marin County.

Another perspective on where workers live compares the C-3 District workers living in a certain area to the total employed population of that area. In 1984, C-3 District workers

represented a relatively large share (45%) of the total employed population in San Francisco. (This means that the remaining 55% of San Francisco's employed residents worked elsewhere in the City or outside of San Francisco; most worked elsewhere in the City.) C-3 District workers living in other parts of the region represent considerably smaller shares of the employed population in each of these other areas (less than 10% in each county outside of San Francisco).

It is important to understand the difference between the two perspectives used above to describe the residence patterns of C-3 District workers. Both describe the same groups of workers. In each case, the same estimate of the number of C-3 District workers living in a certain area is compared to an estimate for a larger group: first, to all C-3 District workers, and, second, to all employed residents of the area in which they live. The percentages differ because the total number of C-3 District workers is different from the total number of employed residents in any one area. The percentage distribution of C-3 District workers among places of residence (shown in Table 2) is used more often, primarily for transportation analysis. The percentage of employed residents of a particular area (San Francisco or the East Bay, for example) who work in the C-3 District is used less often. This latter perspective is a more direct measure of the role of C-3 District jobs in employing San Francisco's and the region's residents.

The residence patterns conditions described above are not static and, in fact, have been changing over time. Residence patterns reflect a variety of factors, including the demographic characteristics of the population and of the labor force, housing market conditions, the location of employment, and transportation options. Changes in the residence patterns for C-3 District workers reflect changes over time in all of these factors.

NOTES - Employment and Housing

/1/ Vorapol Mahaguna, project sponsor, interview, November 26, 1985.

/2/ San Francisco Department of City Planning, Downtown Plan Environmental Impact Report (EIR), EE81.3, Certified October 18, 1984, Vol. 1, pp. IV.B.2 and IV.B.17.

/3/ Downtown Plan EIR, Vol. 1, pp. IV.B.28 and IV.B.31.

/4/ San Francisco Department of City Planning, Commerce and Employment in Chinatown: Issue Paper #3, August 1984.

/5/ Elmer Johnson, Building Owners and Managers Association, telephone conversations, December 22, 1982, June 12, 1984, October 3, 1984, and January 5, 1985.

/6/ Coldwell Banker, "Office Vacancy Index of the United States," September 30, 1985. San Francisco vacancy rates are determined as part of a national survey of 33 major financial districts conducted quarterly. A copy of the survey is on file and available for public review at the Department of City Planning, Office of Environmental Review, 450 McAllister Street.

/7/ Blayney-Dyett, Urban and Regional Planners, July 1982, "Proposed Specific Plan: Bayshore Office Park and Baylands Development Area, Brisbane, California," and Metropolitan Transportation Commission, September 9, 1982, "Travel Impacts of Proposed Development on the Peninsula Along Route 101."

/8/ Department of City Planning, Memorandum to the City Planning Commission, "South of Market Interim Controls," March 31, 1981, p. 2.

/9/ William Cumbelich, Senior Sales Consultant, Office Building Specialist, Coldwell Banker, telephone conversation, February 24, 1984.

/10/ Suzanne Willoughby, Agent, The Rubicon Group, telephone conversation, November 12, 1985.

/11/ Coldwell Banker, "The Commercial Real Estate Market in the San Francisco Bay Area," December 1982, and Ed Hagopian, President, The Rubicon Group, telephone conversation, November 13, 1985.

/12/ Data obtained from U.S. Census by Department of City Planning for Chinatown Planning and Zoning Study, as reported in Chinatown Coalition for Better Housing. The Chinatown - North Beach Residential Hotel Conversion Moratorium: Description and Case Studies. April 1984. A copy of this study is on file and available for public review at the Department of City Planning, Office of Environmental Review, 450 McAllister Street.

/13/ Data from U.S. Census for Chinatown core tracts 113, 114, and 118 as reported in Department of City Planning. Housing in Chinatown: Issue Paper #2. March 1984.

/14/ Data from San Francisco Department of City Planning. Housing in Chinatown: Issue Paper #2. March 1984. These residential totals are slightly inflated, as some units outside the Chinatown Planning and Rezoning Study Area have been counted. Lois Scott, Planner, Department of City Planning, telephone conversation, June 13, 1985. According to the U.S. Census, which often counts residential hotel units not as households but people in group quarters, approximately 4,100 households exist in the three Chinatown core census tracts (113, 115 and 118). The boundaries of the Chinatown Study Area and core census tracts are not identical.

/15/ "Chinatown Under Pressure: Neighborhood's Future in Question," L.A. Chung, San Francisco Chronicle, April 24, 1985.

/16/ Housing goals were based on the "701" study, a study initiated by the Department of City Planning in September 1970 and funded by the U.S. Department of Housing and Urban Development under Section 701 of the Federal Housing Act. In 1972, the Planning

Commission adopted through Resolution 6922 a series of objectives and policies for improving housing conditions in the Chinatown - North Beach area.

/17/ Chinatown Coalition for Better Housing. The Chinatown - North Beach Residential Hotel Conversion Moratorium: Description and Case Studies. April 1984.

/18/ Estimated by Department of City Planning as reported in Chinatown Coalition for Better Housing. The Chinatown - North Beach Residential Hotel Conversion Moratorium: Description and Case Studies. April 1984. A copy of this study is on file and available for public review at the Office of Environmental Review, Department of City Planning, 450 McAllister St.

/19/ U.S. Department of Commerce, 1970 Census of Population and Housing, Census Tracts, Table H-1, and 1980 Census of Housing, General Housing Characteristics: California, Table 1. A copy of this study is on file and available for public review at the Office of Environmental Review, Department of City Planning, 450 McAllister St.

/20/ San Francisco Department of City Planning, Residence Element of the Master Plan, June 28, 1984, Table 17. Preliminary data indicate a net addition of approximately 1,100 units in 1983. (Residence Element, p. 1.12.)

/21/ Real Estate Research Council, Year-End 1983 Report - May, 1984, Volume 35/Numbers 2 and 4. A copy of this study is on file and available for public review at the Office of Environmental Review, Department of City Planning, 450 McAllister St.

/22/ 1980 Census of Housing, General Housing Characteristics: California, Table 1.

/23/ Real Estate Research Council, Market Trend Report - April, 1984, Single Family Residences, Volume 36/Number 1. A copy of this study is on file and available for public review at the Office of Environmental Review, Department of City Planning, 450 McAllister St.

/24/ Data on household incomes from 1970 Census of Population and Housing, Census Tracts, Table H-1, and 1980 Census of Population and Housing, Census Tracts, Table P-11. Census data on housing values and contract rent from sources in note /29/ above. The percentage increase in housing costs was derived by separately calculating the percentage increases for values and for rents and then calculating a combined percentage change which reflects the fact that one-third of the stock increased according to the percentage change in values (since one-third of the stock is owner-occupied, per 1980 Census) and two-thirds increased according to the percentage in rents (two-thirds of the stock is renter-occupied, per 1980 Census). A copy of this study is on file and available for public review at the Office of Environmental Review, Department of City Planning, 450 McAllister St.

/25/ 1980 Census of Population and Housing, Census Tracts, Table P-11 and Table H-8.

/26/ Real Estate Research Council, Market Trend Report - April 1983, Volume 35 / Number 1.

/27/ The data and information presented in this sub-section are based on the survey and analysis of C-3 District employment and residence patterns prepared for the Downtown Plan EIR. The residence patterns for C-3 District workers in 1984 are presented in the

Downtown Plan EIR, Vol. 1, pp. IV.D.36-IV.D.39. The 1981 survey results related to the residence patterns of C-3 District workers are presented on pp. IV.D.1-IV.D.36. These pages are hereby incorporated by reference pursuant to State CEQA Guidelines, Section 15150.

Demographic and labor force trends in San Francisco and the rest of the Bay Area region, as well as patterns in the location of jobs and housing in the region, are described in the Downtown Plan EIR, Vol. 1, pp. IV.D.42-IV.D.58 and in Vol. 2, Appendix I, pp. I.11-I.24. These pages are hereby incorporated by reference, pursuant to State CEQA Guidelines, Section 15150.

IV. ENVIRONMENTAL IMPACTS

An application for environmental evaluation for the project was filed on October 26, 1984. On July 5, 1985, on the basis of an Initial Study, the Department of City Planning Office of Environmental Review determined that an Environmental Impact Report was required. Issues determined as a result of the Initial Study to require no further environmental analysis include: Noise, Air Quality during Construction, Energy, Utilities/Public Services, Biology, Geology/Topography, Water and Hazards. Therefore, this document does not discuss these issues (see Appendix A, pp. A-2 - A-38, for the Initial Study). The project as proposed differs in size and form from the design considered in the Initial Study. No change in the issues determined to require no further environmental analysis is warranted by the differences. Some of the impacts presented in this section are not physical environmental effects as defined by the California Environmental Quality Act. They are included in the EIR for informational purposes only.

A. LAND USE AND ZONING

LAND USE

Land-use changes resulting from the project would be intensified office and retail space, and the re-introduction of residential uses on the project block. The two office structures proposed for the project would extend the increased scale of office and retail uses of the

- Financial District across Washington Street, which is the northern boundary of the C-3-0 district and currently serves as the northern boundary of the concentration of newer office development in the Financial District. Two other mid-rise buildings, 801 Montgomery (six stories) and the Columbus/Pacific (Savoy) building (five stories), were recently completed, and two projects, at 900 Kearny Street (six stories) and 50 Osgood Place (five stories), are approved for construction in the project vicinity.

On A-Site, the project would include all new construction of a 14-story office, retail and residential building, and on B-Site, demolition of a two-story office and retail building

and new construction of an eight-story building. In total, the project (both A- and B-Sites) would add about 172,300 gross sq. ft. of new office space, about 15,800 gross sq. ft. of new retail space, about 53,700 gross sq. ft. of residential space (120 units), and about 51,900 gross sq. ft. of basement parking (139 valet or 69 independently accessible spaces).

The project would not change the historic uses on the sites, but would affect the scale and character of the surrounding neighborhoods except for the Financial District. The number of workers employed at the sites would increase with the project. Development of A-Site would re-introduce a residential population onto A-Site (the I-Hotel and the Victory Hotel contained up to 234 rooms prior to being demolished in 1979). Pedestrian activity at the site would increase due to people's patronizing retail establishments, and going to or from their place of employment or (on A-Site) their place of residence.

The project could increase pressure for conversion of nearby uses from lower-income-producing uses to higher-income-producing uses. (The project is a response to existing pressure of this type.) However, the reduced 4.8:1 FAR limit proposed for the C-2-C Use District would, if adopted as permanent zoning, apply to future development in Chinatown. Development in Jackson Square is restricted by conservation policies, height and bulk restrictions and FAR limits. Development in North Beach is restricted by zoning and City policies discouraging demolition of housing. Increased patronage by project residents and office workers would stimulate business for the restaurants, drug stores, grocery markets, and other service providers in the vicinity.

ZONING

- The two sites are in an area where the City has recently adopted permanent zoning controls which change the zoning of the project sites from C-2 (Community Business) to CR/NC (Chinatown Residential/Neighborhood Commercial) for A-Site and to CCB (Chinatown Community Business) for B-Site. The Chinatown Permanent Controls require Conditional Use (CU) authorization for new buildings with heights above 35 ft. to allow for sunlight access to Chinatown sidewalks (Section 254). The project, at about 165 ft. to the top of the highest occupied level (not including the 14th mechanical level or the mechanical penthouse - an additional 30 ft.) on A-Site, and about 94 ft. (not including the six-ft.-tall mechanical penthouse) on B-Site, would require CU authorization.

The basic Floor Area Ratio (FAR) for the CR/NC District is 1.0:1; the FAR for the CCB District is 2.8:1. These FAR limits would not apply to the proposed project, in accordance with Section 124.1(a) of the Chinatown Permanent Controls which provides that developments with a commitment of Community Development Block Grant (CDBG) funds as of January 10, 1985 for creation of new housing can be developed under the FAR of the underlying zoning. The permitted FAR for both sites is about 12.0:1, including corner and interior lot premiums. The FAR proposed for the project on A-Site would be about 9.7:1 (including residential use and non-accessory parking in the floor area calculation); the FAR proposed for the project on B-Site would be about 7.0:1.

- The project would exceed the 65 ft. height limit of the 65-D-2 Height and Bulk District and would require CU authorization to exceed 65 ft.; height up to 200 ft. may be permitted (pursuant to Section 263.1 of the City Planning Code). The project has been designed to conform to height restrictions (but not bulk; a Special Exception would be sought from the bulk requirements for both structures as provided for in Section 271 of the City Planning Code) of the 65-D-2 district. As stated earlier, Chinatown Permanent Controls require CU authorization for buildings exceeding 35 ft. in height.
- Under the permanent controls, which govern the residential density allowable on the site, the permitted dwelling unit density is one for each 200 sq. ft. of lot area (City Planning Code Section 207.5). Thus, A-Site would be allowed 94 units. The Code further provides, under Section 209.1(m) that dwellings specifically designed for, or occupied by senior citizens or physically handicapped persons (units must be limited to such occupancy for the lifetime of the buildings) may be allowed at a density not exceeding twice the number of units otherwise permitted. Residential units within the project are specifically designed for senior citizens (17.5% of the tenants residing in the tower would have units meeting handicapped requirements). The 120 units proposed would be fewer than the 188 units permitted.

The project is located in the Washington/Broadway Special Use District No. 1 and would not be required to provide parking for any use other than dwellings, since neither site exceeds 20,000 gross sq. ft. Twenty-four parking spaces would be required for the 120 elderly housing units on A-Site (Planning Code Section 151 requires one-fifth of

the parking requirement of one space per dwelling unit for senior citizen housing); 108 valet or 54 independently accessible parking spaces are proposed on A-Site, 24 of which would be reserved for residential tenants. Thirty-one valet or 15 independently accessible parking spaces are proposed on B-Site, for a total of 139 valet or 69 independently accessible spaces for the entire project. Section 204.5(c) of the Planning Code allows seven percent of the gross floor area as accessory parking, which would be about 6,356 sq. ft. on B-Site (about 18 valet spaces) and about 7,624 sq. ft. on A-Site (about 22 valet spaces). CU authorization would be necessary for the additional square footage of parking proposed (7,704 sq. ft. on B-Site and 30,216 sq. ft. on A-Site). The project sponsor would seek CU authorization for a total of about 75 valet spaces.

- The project would not meet the Planning Code site coverage requirement for Chinatown Mixed Use Districts (Section 134.1). In Mixed Use Districts, at the lowest story occupied as a dwelling, the site coverage allowed is no more than 75%. The non-covered area requirement may be provided in a location other than a rear yard, including roof top terraces and balconies. The project sponsor would seek a variance from this requirement. Both project buildings would require exception from bulk requirements (in accordance with Planning Code Section 271).

B. URBAN DESIGN AND SITE VISIBILITY

URBAN DESIGN

Construction of a 14-story structure on the vacant A-Site, and demolition of the two-story Colombo Building and construction of an eight-story structure on B-Site would alter the scale, facade rhythm, and urban texture of the project block and its vicinity.

- The proposed office tower on A-Site would be about three to six times the height of prevailing development on the project block and, in general, throughout the North Beach, Chinatown and Jackson Square districts to the north, west and east, respectively. The project would represent a departure in form and scale from existing development on the project block; it would be similar to newer high-rise and mid-rise structures located mainly south of the project block. The base element of the proposed A-Site structure would relate to existing smaller-scaled structures across Kearny Street from the project site. The development of A-Site, vacant since 1979, would create a stronger sense of street enclosure; continuous street enclosure is common to Chinatown, adjacent to the west.

The building on B-Site would be clad in a light-colored terra-cotta or similar material, which would be like that on the old Transamerica building across the street. Its base and cornice heights would be similar in proportion to that building. The 94-ft.-tall office building on B-Site would be triangular in plan and is intended to continue of the role the Colombo Building, in forming an entrance to North Beach along with the old Transamerica Building.

The Urban Design Element of the San Francisco Master Plan contains policies and principles which may be used to evaluate the project. Table 3, p. 82, the Relationship Between Applicable Urban Design Policies of the Master Plan and the Proposed Project, compares the project to these policies.

SITE VISIBILITY

In some short- and mid-range views, the two project structures would alter the small-scale character of the area (see Figures 21 to 25, pp. 85 to 89). The project would be visible from medium- and long-range view points to the north and west. From Telegraph Hill and Nob Hill, the project would be visible as part of a group of existing and under-construction high-rise structures of the Financial District (see Figures 26 and 27, pp. 90 and 91).

C. SHADOW AND WIND

A shadow analysis was conducted for the proposed project for all four seasons of the year (March, June, September and December) at 10:00 a.m., noon and 3:00 p.m., to determine the range of project shadow impacts. Surrounding highrises, such as the Transamerica Pyramid, currently cast substantial shadow in the project vicinity.

In March at about 10:00 a.m. (see Figure 28), the project would cast new shadow on the intersection of Kearny and Jackson Sts., along the street frontages of A-Site. The building on B-Site would cast new shadow on rooftops and a small portion of Ils Lane in the interior of the project block. By noon, the shadows would have shortened, shadows from the A-Site building would extend northward across Jackson Street, covering a portion of the block across the street. Shadows from the building on B-Site would extend northward including new shadow mainly on Columbus Avenue opposite Gibb Street.

TABLE 3: RELATIONSHIP BETWEEN APPLICABLE URBAN DESIGN POLICIES OF THE MASTER PLAN AND THE PROPOSED PROJECT

URBAN DESIGN PLAN POLICIES

Objective 1, Policy 1 - "Recognize and protect major views in the city, with particular attention to those of open space and water."

Objective 1, Policy 3 - "Recognize that buildings, when seen together, produce a total effect that characterizes the City and its districts."

Objective 1, Policy 5 - "Emphasize the special nature of each district through distinctive landscaping and other features."

RELATIONSHIP OF PROJECT TO POLICIES

The project sites are outside view corridors along Montgomery Street and Clay Street. The project would not obstruct any public views of the Bay, or of Coit Tower on Telegraph Hill.

The project would be visible from medium- and long-range view points. From Telegraph Hill and Nob Hill, the project would be visible as part of a group of existing and under-construction high-rise structures of the Financial District. In short-range views, the two project structures would alter the small-scale character of the area. The intersection of Columbus Avenue with Montgomery and Washington Streets is important to the perception of the City pattern as a point of orientation.

The project would not incorporate characteristics of all four surrounding districts. The architectural features of the two project buildings would be similar to those of buildings in the Financial District to the south, and to some of the mid-rise structures in the North Beach district. The density of the project buildings would contrast with the generally low-rise, small-scale character of the other two adjacent neighborhoods. Street-level landscaping of a type and size appropriate to the area would be planted on the Jackson and Kearny frontages of A-Site and the Washington and Columbus frontages of B-Site.

TABLE 3: RELATIONSHIP BETWEEN APPLICABLE URBAN DESIGN POLICIES OF THE MASTER PLAN AND THE PROPOSED PROJECT (Continued)

URBAN DESIGN PLAN POLICIES

Objective 1, Policy 7 - "Recognize the natural boundaries of districts, and promote connections between districts."

Objective 3, Policy 1 - "Promote harmony in the visual relationships and transitions between new and older buildings. New buildings should be made sympathetic to the scale, form, and proportion of older development."

Objective 3, Policy 2 - "Avoid extreme contrasts in color, shape and other characteristics which will cause new buildings to stand out in excess of their public importance."

RELATIONSHIP OF PROJECT TO POLICIES

The structure on A-site would incorporate a base element which would relate to existing two-story development in Chinatown; the residential portion of the structure would step down from the office portion which in turn steps down from the Holiday Inn. The structure on B-Site would step down on the south. The density of the project buildings would contrast with the low-rise character of the area north of Washington Street.

The structure on B-Site would replace the two-story Colombo Building. The proposed structure is intended to relate to, and complement, existing development in Jackson Square, through the use of setbacks and cornice lines. Both buildings would be of a larger scale than the existing building on the site and other nearby older developments.

Facade materials for the proposed structures have not yet been chosen; terra cotta is being considered for the structure on B-Site, and brick and/or granite for the A-Site structure. Existing buildings in the vicinity are of a variety of materials, including metal, glass, stone, reinforced concrete, stucco, and brick.

TABLE 3: RELATIONSHIP BETWEEN APPLICABLE URBAN DESIGN POLICIES OF THE MASTER PLAN AND THE PROPOSED PROJECT (Continued)

URBAN DESIGN PLAN POLICIES

Objective 3, Policy 5 - "Relate the height of buildings to important attributes of the city pattern and to the height and character of existing development."

Objective 3, Policy 6 - "Relate the bulk of buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction."

- Objective 2, Policy 6 - Respect the character of older development nearby in the design of new buildings.
- Objective 2, Policy 7 - Renovation and restoration of older, well designed buildings can preserve the character and interest of the streetscape if the original building design is respected in use of materials and details.

RELATIONSHIP OF PROJECT TO POLICIES

The project would introduce two mid-rise buildings on a block of two- to five-story buildings. The tallest portion of the project would be about 150 ft., taller than nearby low-rise buildings which are generally under 80 ft. in height. The project (both buildings) would be taller than the eight-story Columbus Tower building, one block north of the project block, and would be shorter than the 300-ft.-tall Montgomery/Washington building, and the 850-ft.-tall Transamerica Pyramid building located on the blocks south of the project sites.

The scale of both building bases would be similar in scale to older structures in the vicinity. The buildings would be greater in height and bulk than the prevailing scale of development to the west, north and east. They would be similar in scale to many buildings to the south.

The base element of the building on A-Site would be of a similar scale to existing low-scale development in Chinatown. The office tower on A-Site would be eight to ten times taller than existing low-scale development in Chinatown. The building on B-Site would use facade detailing and cornice lines to relate the new construction to existing development in Jackson Square.

The project would not respond to this policy; the project does not include renovation or restoration of a building - the Colombo Building, rated "3" in the 1976 DCP Architectural Inventory, and B* in the Heritage extended survey, would be demolished.

SOURCE: Urban Design Element, San Francisco Comprehensive Plan, 1971;
Environmental Science Associates, Inc.

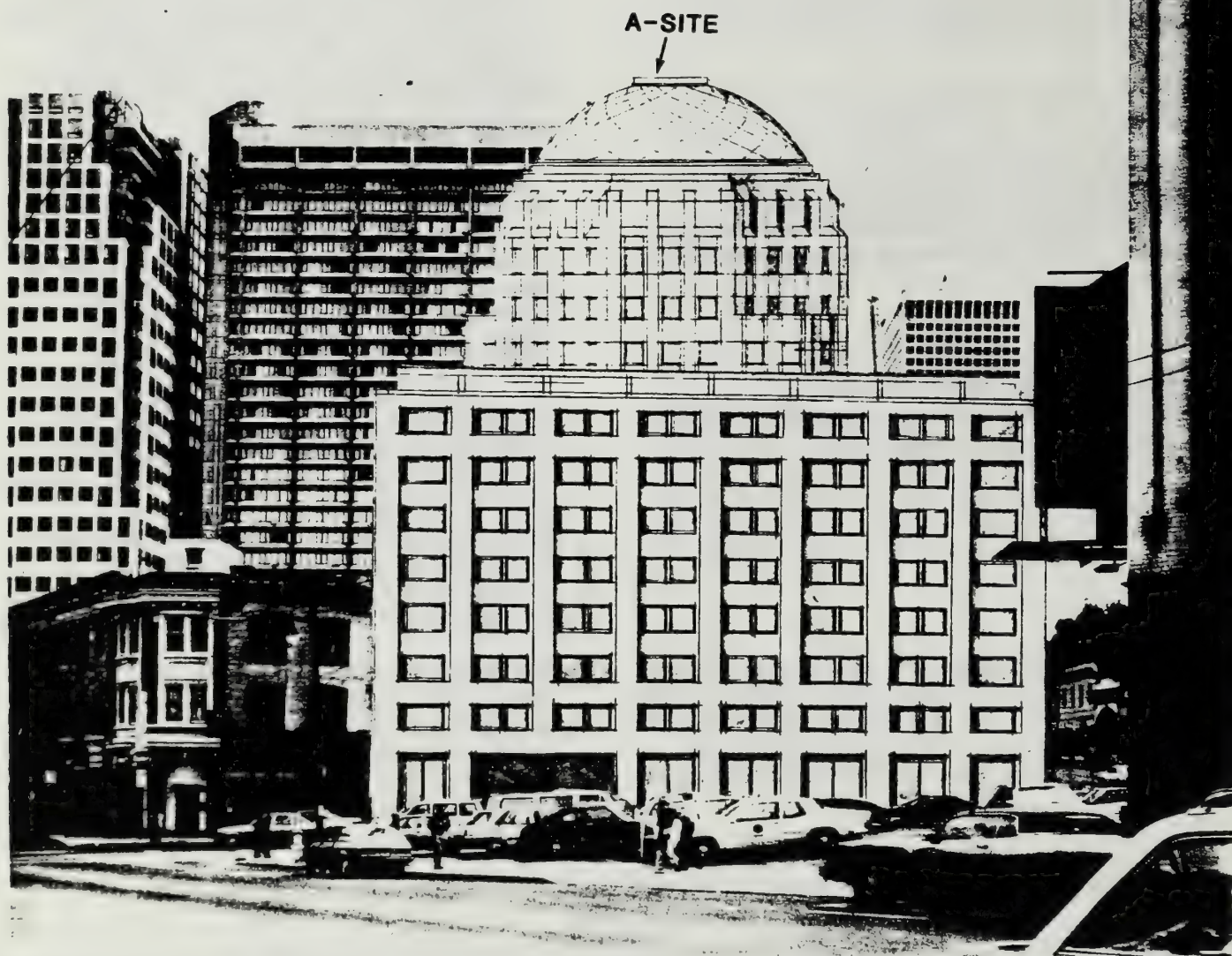
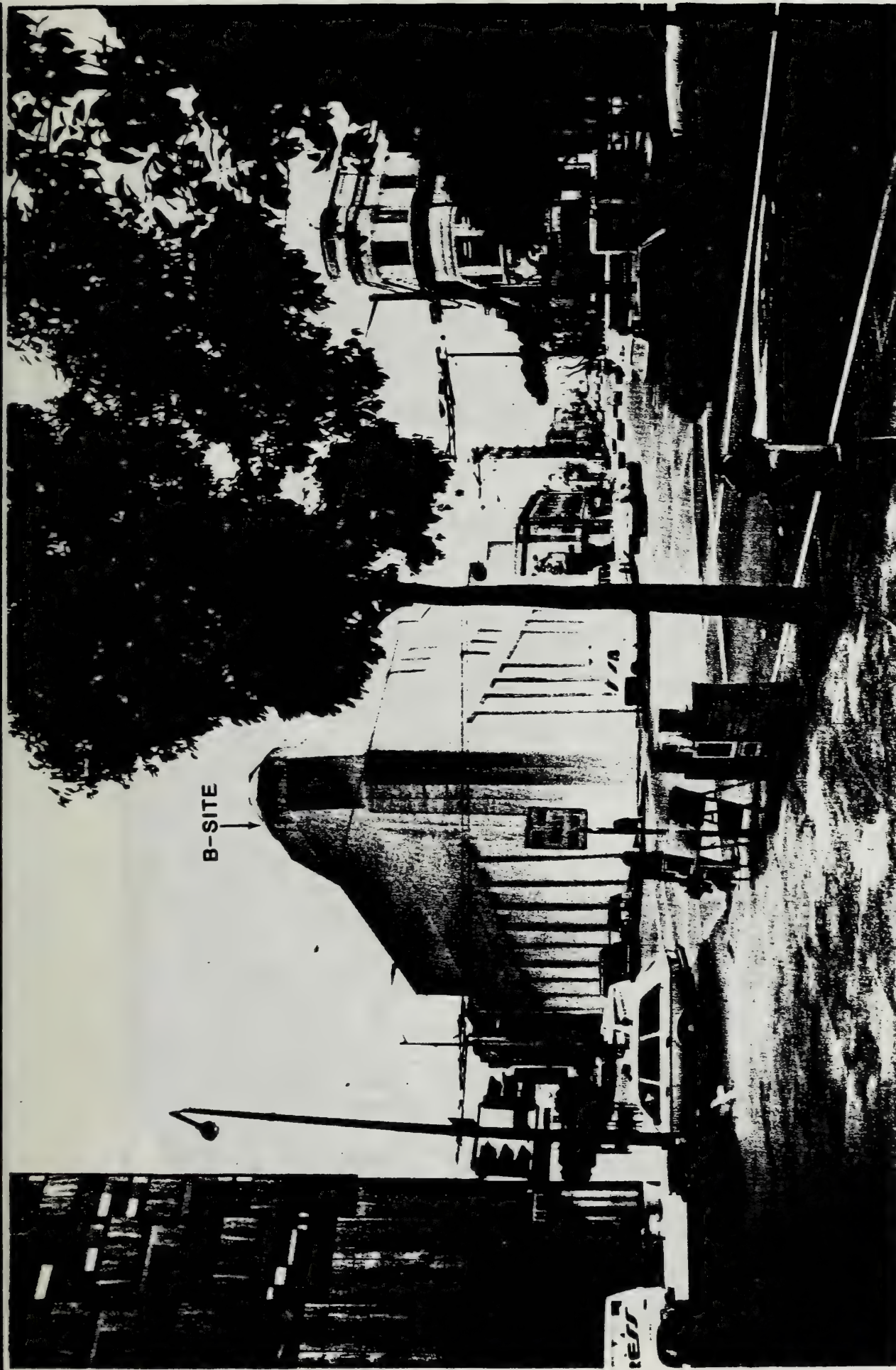


FIGURE 21

PHOTOMONTAGE OF A-SITE

FROM COLUMBUS AVENUE, NORTH OF JACKSON STREET

SOURCE: Douglas Symes and ESA



B-SITE

FIGURE 22
PHOTOMONTAGE FROM
EAST OF COLUMBUS / WASHINGTON INTERSECTION

SOURCE: Douglas Symes and ESA



FIGURE 23
PHOTOMONTAGE OF A- AND B-SITES
FROM COLUMBUS/KEARNY INTERSECTION

SOURCE: Douglas Symes and ESA

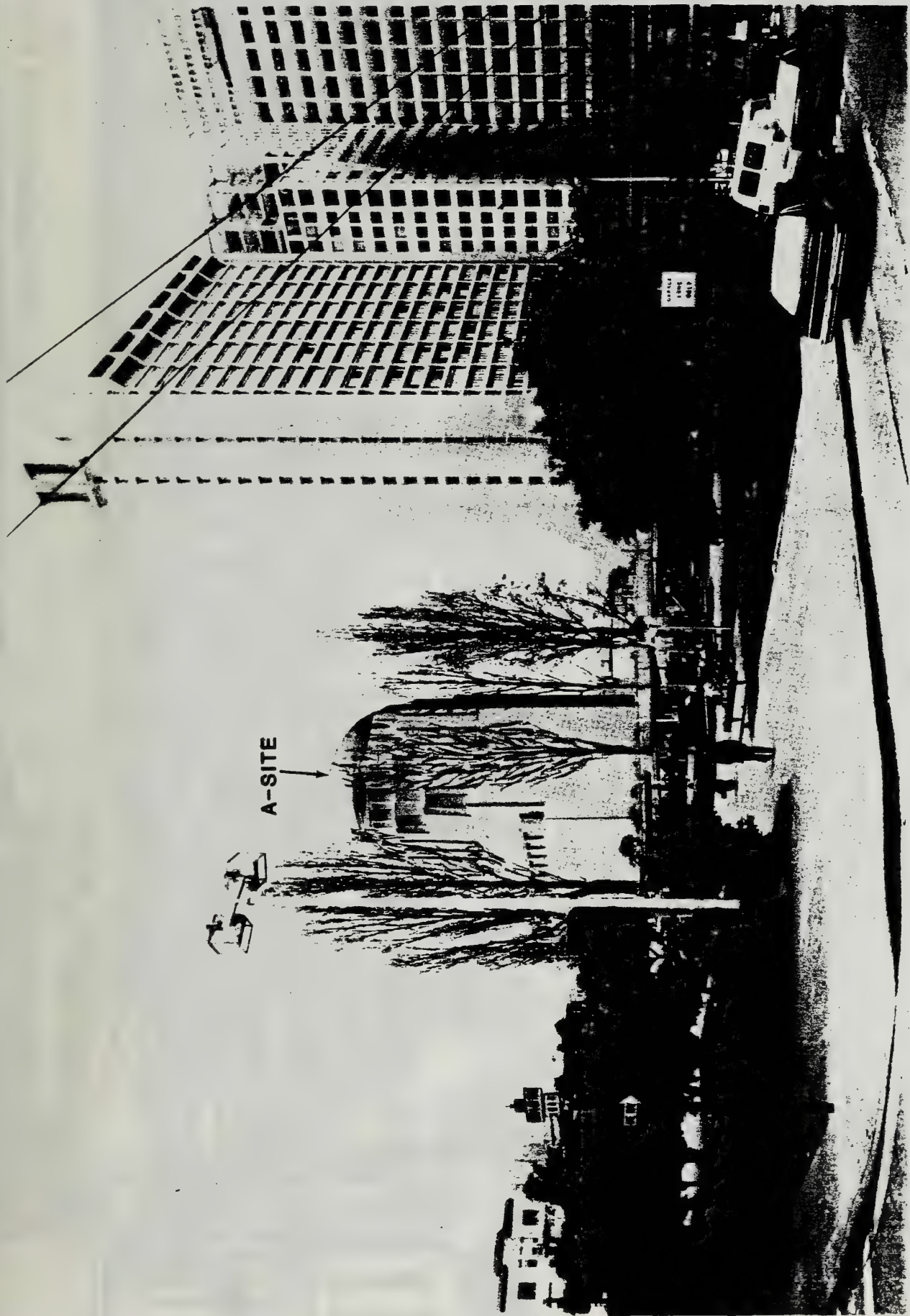


FIGURE 24
PHOTOMONTAGE OF A-SITE
FROM SOUTHWEST CORNER OF PORTSMOUTH SQUARE

SOURCE: Douglas Symes and Heller Leake

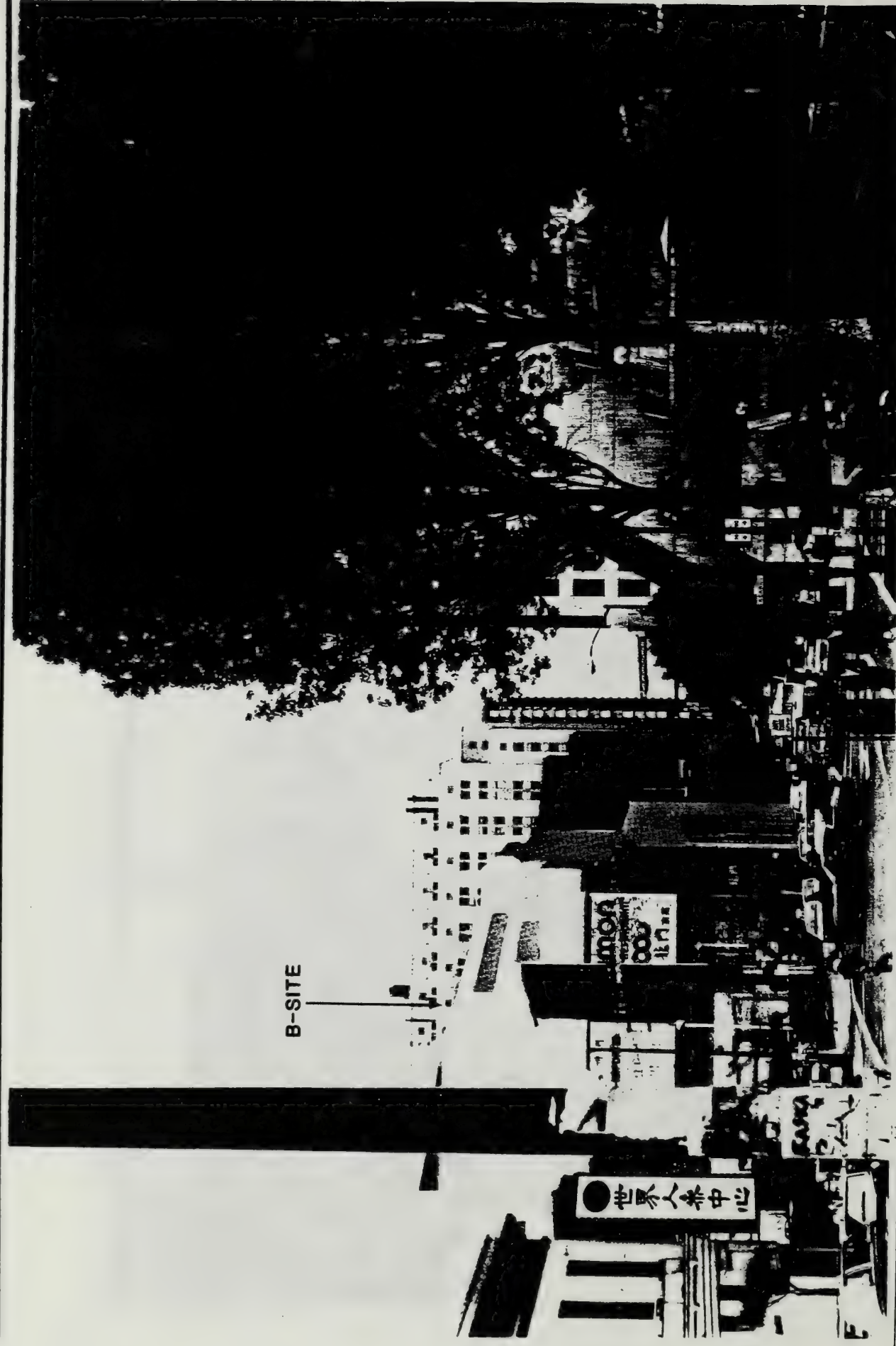


FIGURE 25
PHOTOMONTAGE OF B-SITE
FROM WEST OF KEARNY/WASHINGTON INTERSECTION

SOURCE: Douglas Symes and ESA



FIGURE 26
PHOTOMONTAGE
FROM NOB HILL

SOURCE: Douglas Symes and ESA



FIGURE 27
PHOTOMONTAGE
FROM TELEGRAPH HILL

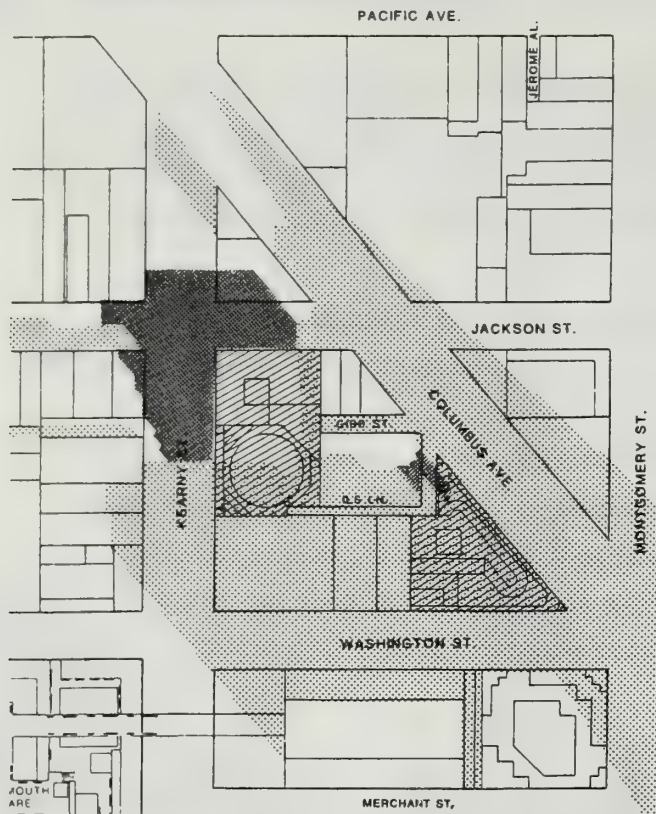
SOURCE: Douglas Symes and ESA

At 3:00 p.m., shadow from A-Site would extend northeastward as far as the eastern side of Columbus Avenue, covering streets, sidewalks, the bus stop on Columbus, and rooftops, and also the outside seating area of the Clown Alley restaurant. Shadow from the building on B-Site would extend across Columbus Avenue to the old Transamerica building.

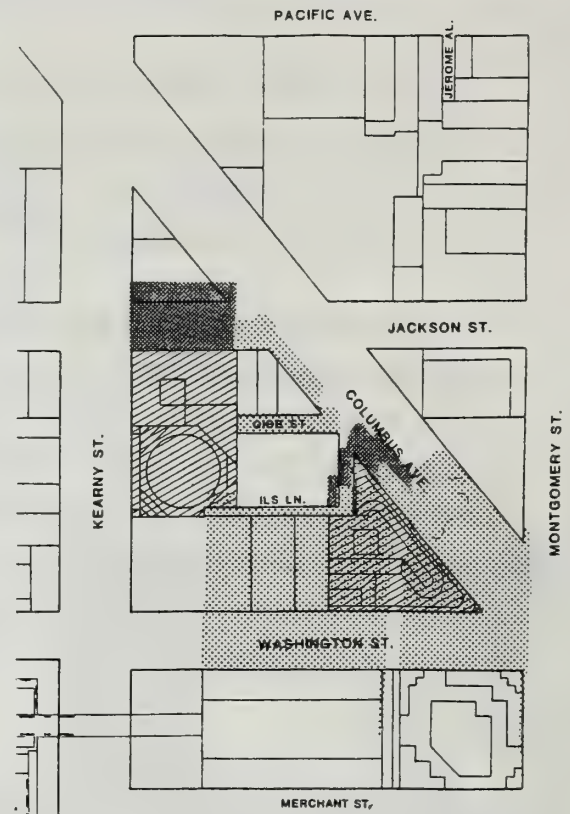
In June at 10:00 a.m. (see Figure 29), the building on A-Site would cast shadows northwestward across Kearny Street and onto rooftops across the street; the building on B-Site would cast shadow northwestward mainly onto rooftops on the interior of the project block. By noon, project shadows would have shortened somewhat; A-Site would shade portions of streets and sidewalks north and west of the site; B-Site would shade portions of Ils Lane and rooftops in its immediate vicinity. At 3:00 p.m., the structure on A-Site would shade the southern sidewalk of Jackson Street and rooftops northeast of the site on the project block; B-Site would add some new shadow to mid-way across Columbus Avenue.

In September at 10:00 a.m. (see Figure 30), the Transamerica Pyramid and the Holiday Inn cast shadow across both project sites; the proposed structure on A-Site would add new shadow to portions of Kearny and Jackson Streets and rooftops at the southwest corner of the Jackson/Kearny intersection. The building on B-Site would cast no new shadow at 10:00 a.m. At noon, the building on A-Site would cast new shadow extending westward about halfway across Kearny Street and past Jackson Street to the next block; the building on B-Site would shade a portion of Columbus Avenue opposite Gibb Street, and rooftops on the interior of the block northeast of the site. At 3:00 p.m., the building on A-Site would cast shadow northeastward, terminating on Columbus Avenue, shading streets, sidewalks, and rooftops. The structure on B-Site would cast some new shadow on Columbus Avenue as far as the old Transamerica building.

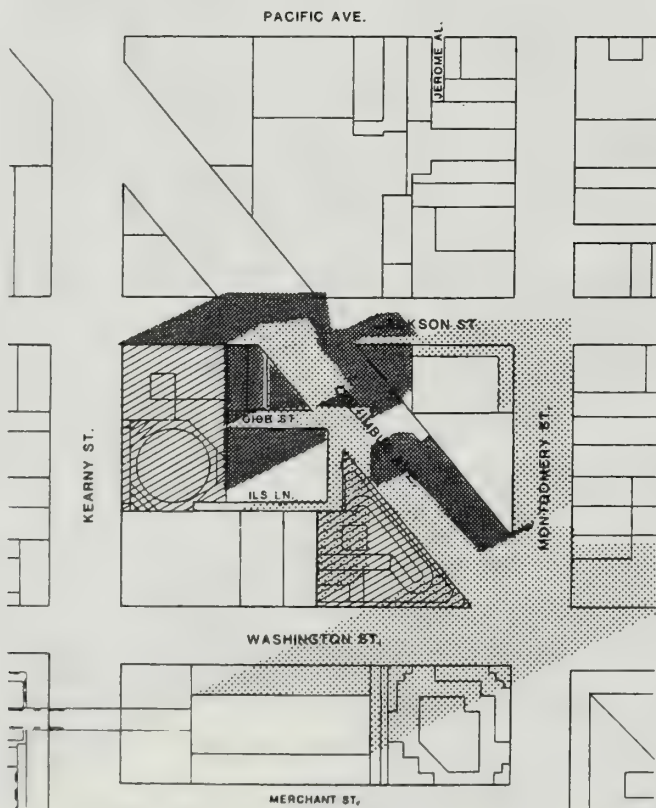
In December at 10:00 a.m. (see Figure 31), the Montgomery/Washington building and the Holiday Inn shade both project sites; the only new shadow from the project at this time would be on the roof of the building at the southwest corner of the intersection of Pacific and Columbus Avenues. At noon, the structure on A-Site would cast new shadow northward across Jackson Street as far as the north side of Columbus Avenue; there would be no new shadow from B-site at this time. At 3:00 p.m., the structure on A-Site would cast new shadow northeastward, shading streets, sidewalks and rooftops as far as



10 AM PST



NOON PST



3 PM PST

LEGEND




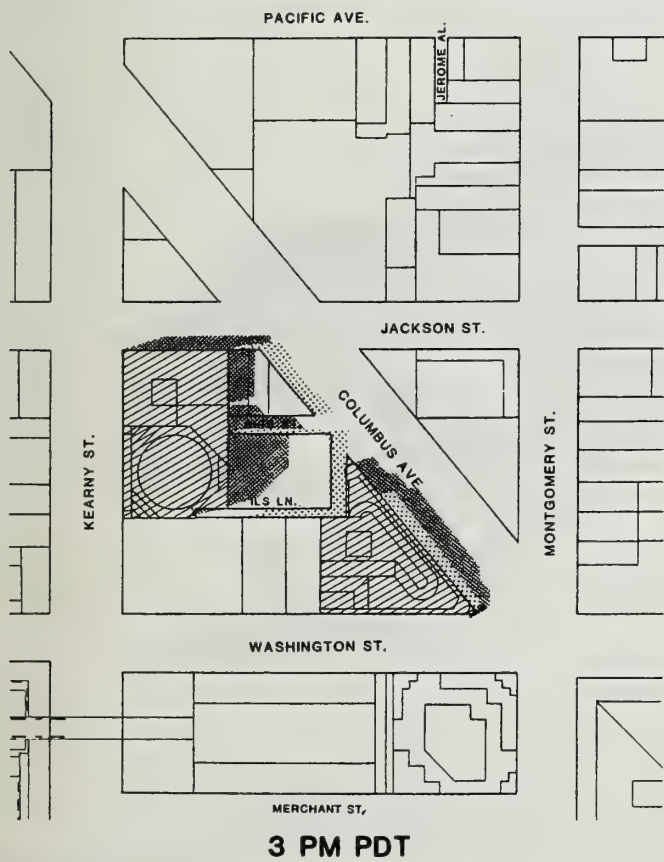
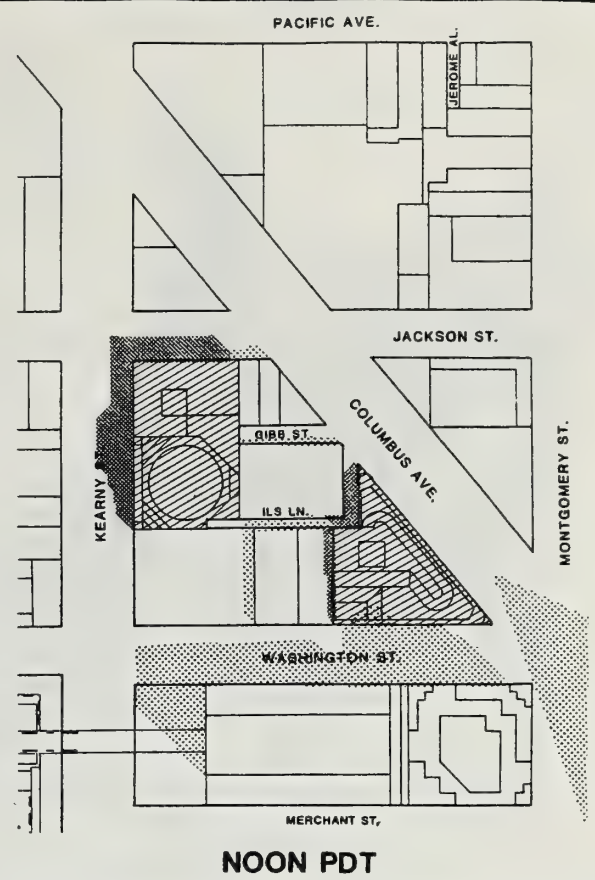
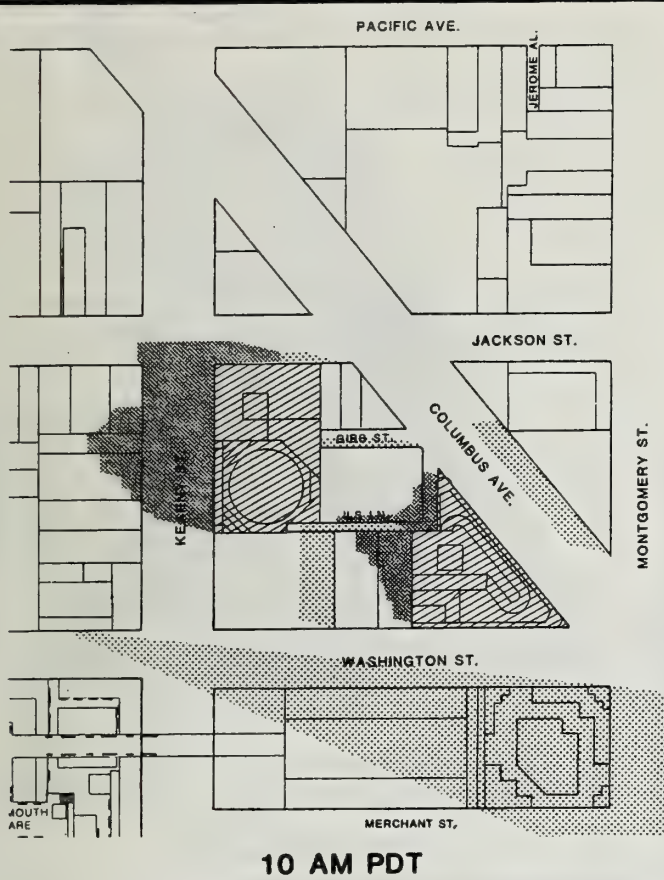
-  SHADOW FROM EXISTING BUILDINGS
-  NET NEW SHADOW FROM PROJECT
-  PROJECT SITES



FIGURE 28
PROJECT SHADOW PATTERN
MARCH 21

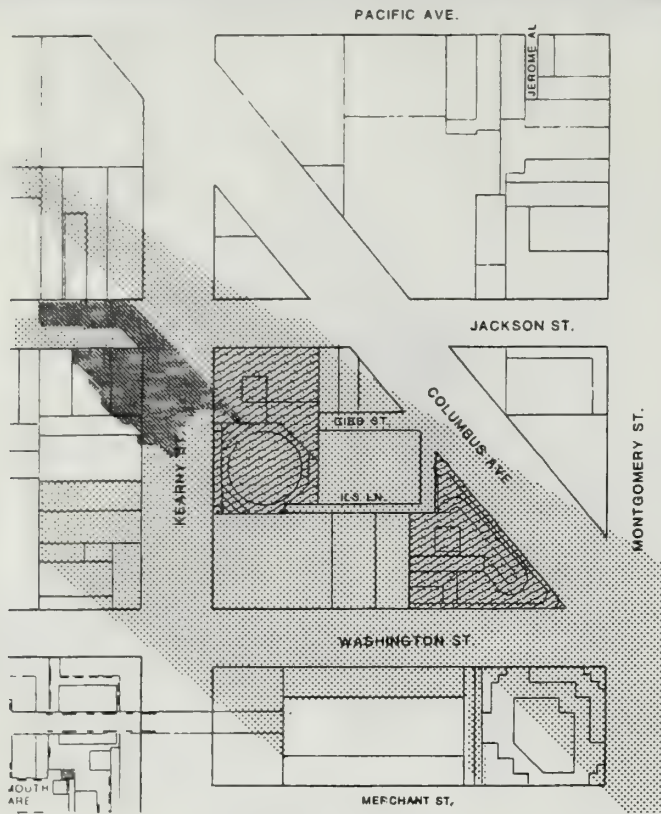


LEGEND

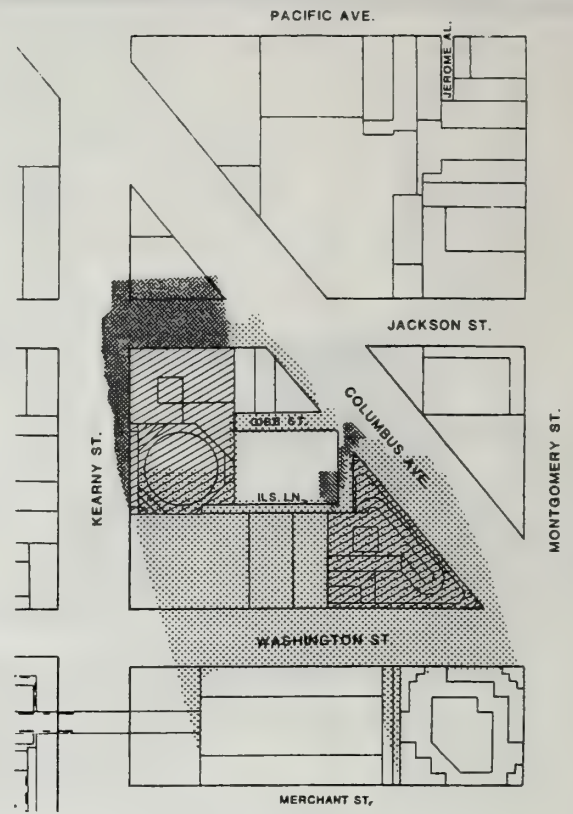
- SHADOW FROM EXISTING BUILDINGS
- NET NEW SHADOW FROM PROJECT
- PROJECT SITES



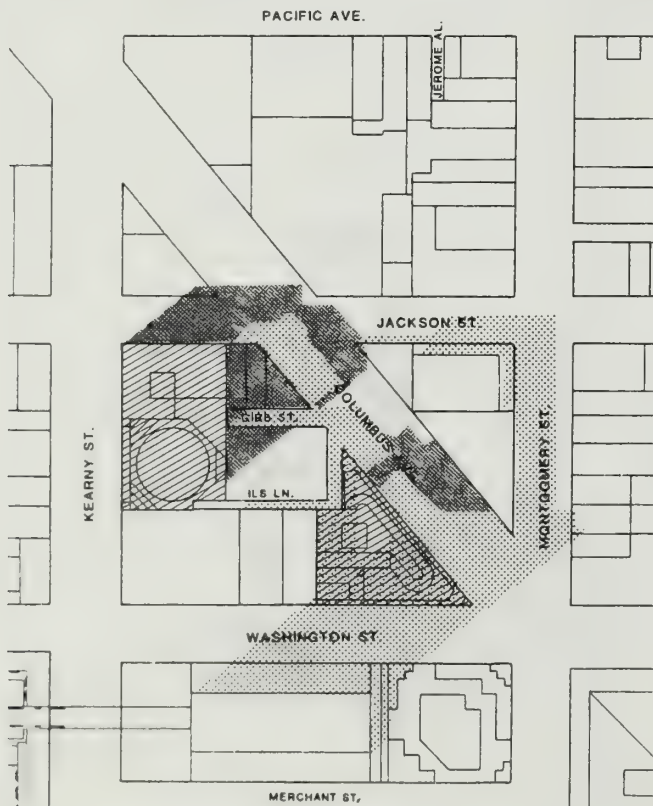
FIGURE 29
PROJECT SHADOW PATTERN
JUNE 21



10 AM PDT



NOON PDT



3 PM PDT

LEGEND



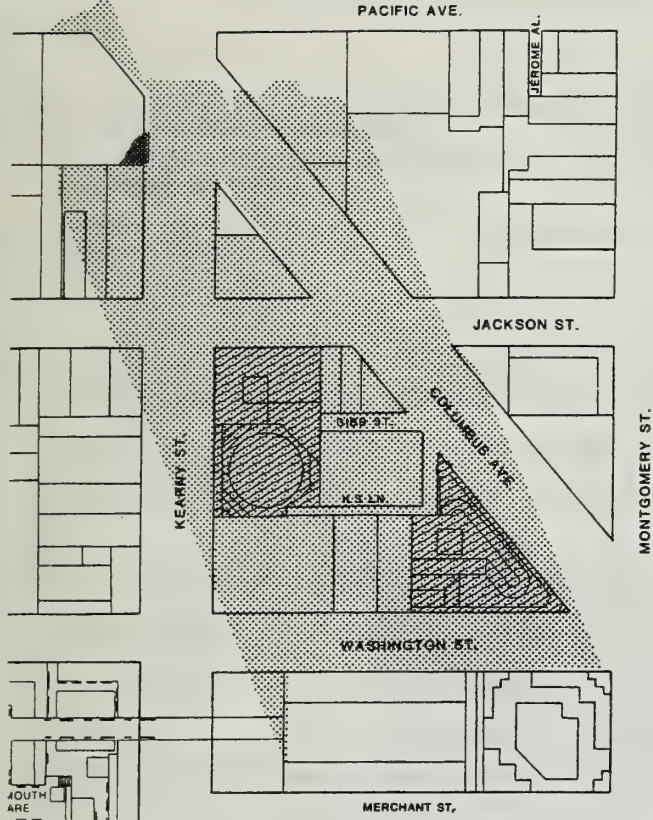
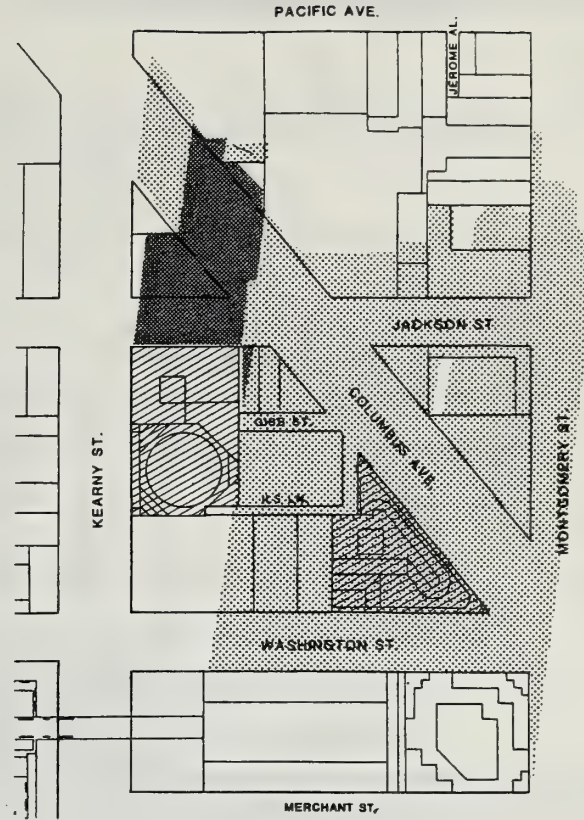
-  SHADOW FROM EXISTING BUILDINGS
-  NET NEW SHADOW FROM PROJECT
-  PROJECT SITES



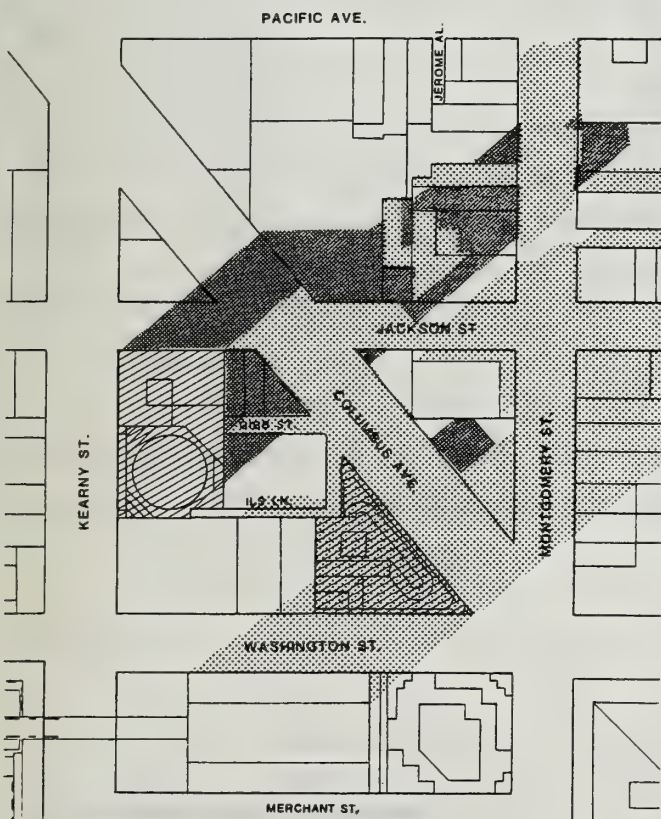
FIGURE 30
PROJECT SHADOW PATTERN
SEPTEMBER 21



10 AM PST



NOON PST



3 PM PST

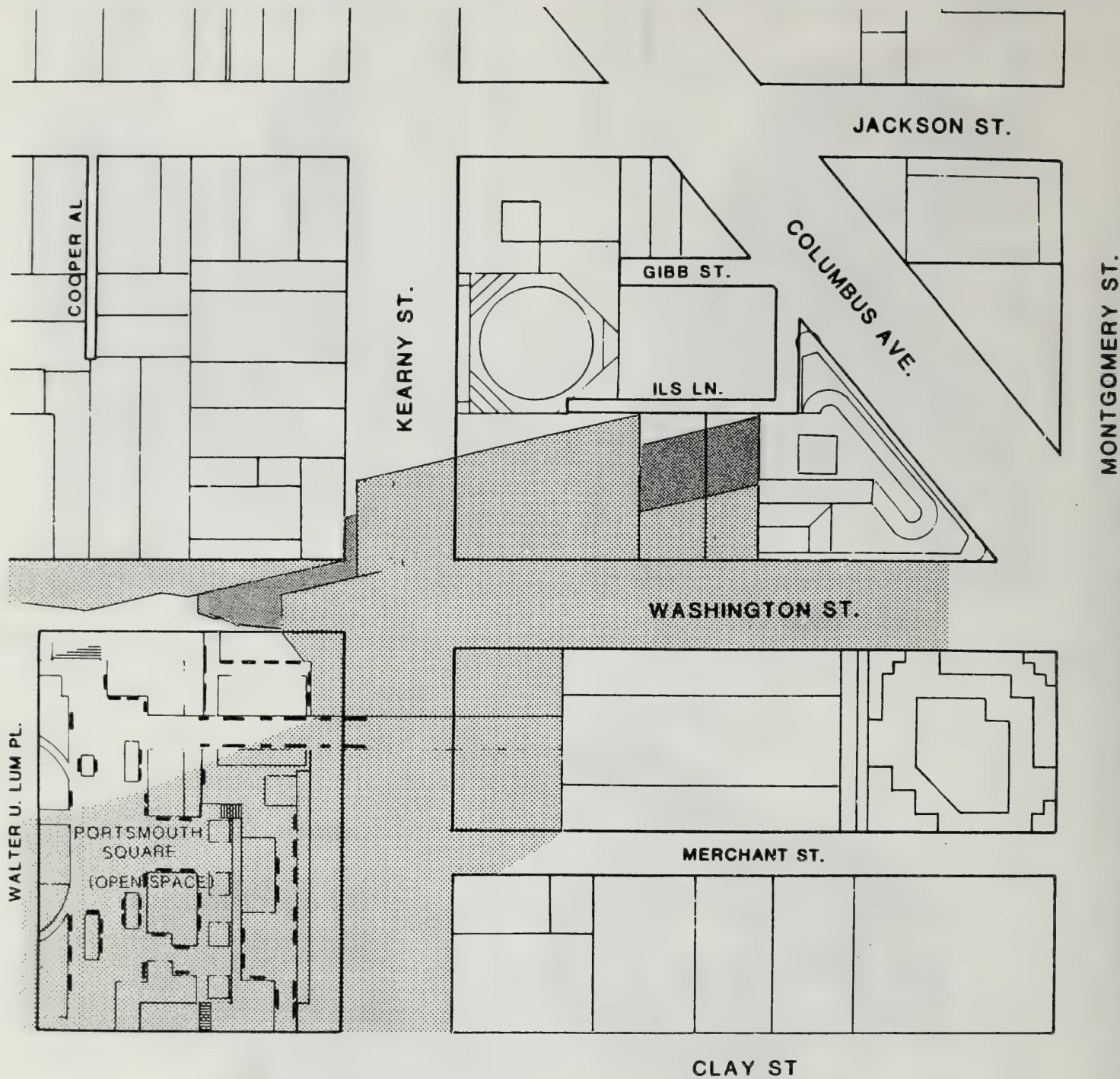
LEGEND

-  SHADOW FROM EXISTING BUILDINGS
-  NET NEW SHADOW FROM PROJECT
-  PROJECT SITES



SOURCE: ESA

FIGURE 31
PROJECT SHADOW PATTERN
DECEMBER 21



JUNE 21, 6:48 AM (PDT)

- EXISTING SHADOW
- NET NEW SHADOW FROM PROJECT

0 FEET 200



FIGURE 32
CLOSEST APPROACH OF PROJECT
SHADOW TO PORTSMOUTH SQUARE
DURING THE HOURS OF PROPOSITION K

SOURCE: ESA

Montgomery Street just south of Pacific Avenue; B-Site would cast new shadow on the rooftops of structures on the block across Columbus Avenue.

Proposition K

On June 5, 1984, Proposition K, the Shadow Ban Initiative Ordinance, was passed by the voters. Generally, Proposition K prohibits issuance of a building permit for structures that will cast any significant shadow upon property under the jurisdiction of, or designated for acquisition by, the Recreation and Park Department.

The only property under the jurisdiction of (or designated for acquisition by) the Recreation and Parks Department which the project could possibly shade is Portsmouth Square, located one-half block southwest of the site. Figure 32 shows the maximum extent of project shadow towards Portsmouth Square. The project would add no new shadow to Portsmouth Square from one hour after sunrise to one hour before sunset year round.

Sky Plane Analysis

Analyses of sunlight duration were prepared for a location near the project site (see Figure 33). Diagrams of the sun's yearly path are superimposed on a fish-eye lens photograph of the sky. This technique accurately depicts the times of the year and day that direct sunlight reaches a location, but creates an exaggerated image due to the distortion inherent in using a fish-eye lens. Local solar time, similar to Pacific Standard Time (PST), is used. During the time of year that Pacific Daylight Time (PDT) is in effect, the sun location at a given clock time would be comparable to about one hour earlier than indicated on Figure 33. This technique differs from the shadow pattern analysis, in that it predicts the duration of sunlight at a specified location, not the extent of the shadow at a given time.

WIND/1/

Prevailing winds in San Francisco are from the northwest, west-northwest, west, and west-southwest. Wind tunnel measurements were made at 21 surface locations near the project site for each of the prevailing wind directions using a scale model of the site, the

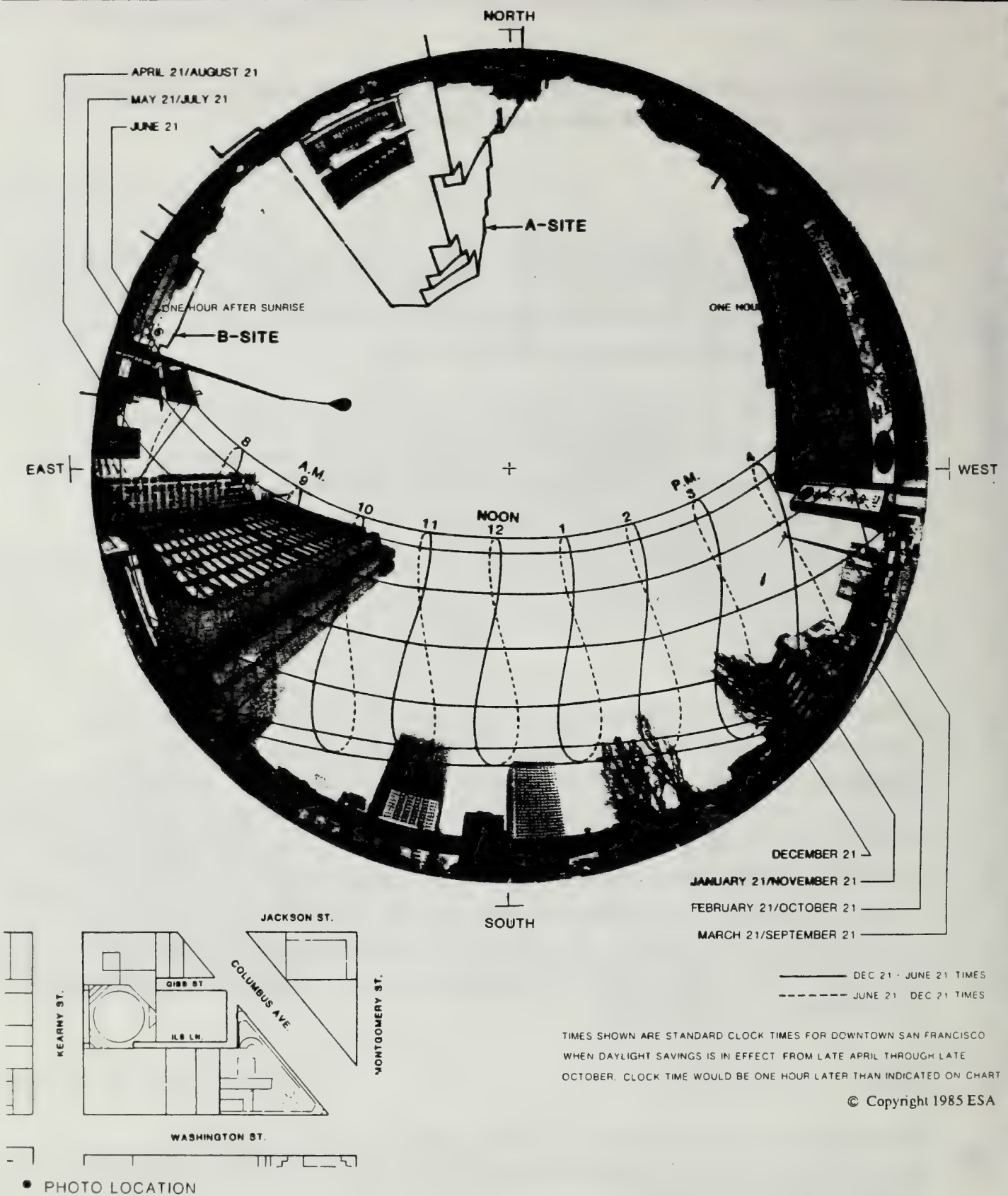


FIGURE 33
SKY PLANE ANALYSIS

SOURCE: ESA

project and vicinity. The study included separate tests of northwest, west-northwest and west winds under existing conditions with the project in place, with a code-conforming alternative, and with a preservation alternative.

Wind test data were combined with wind records to predict the winds speeds that would be exceeded 10% of the time at each test location. The predicted winds were then compared to the comfort and hazard criteria in the Planning Code, established in the Downtown Plan. (See Appendix B, p. A-39 for a summary of the full wind analysis.) Throughout the following discussion, the wind speeds reported refer to the equivalent wind speeds that would be exceeded 10% of the time./2/

Existing winds in the project vicinity range from seven mph to 15 mph. The strongest winds occur along Washington Street west of Montgomery Street, where none of the wind speeds is less than 13 mph. Winds at seven of the 21 locations currently exceed the pedestrian comfort criterion.

The project would result in winds which range from seven mph to 12 mph. The project would cause winds to decrease at 12 of the 21 locations, including all where existing winds exceed 10 mph. Winds would be unchanged at four locations and would be increased at five locations. Winds at three locations, even though reduced by the project, would still violate the 11 mph pedestrian comfort criterion. The comfort criterion would be violated four percent of the time at the southwest corner of the Washington/Montgomery intersection (location 2), three percent of the time at the center of the Washington Street frontage of the Washington / Montgomery building (location 6), and five percent of the time at the center of the Washington Street frontage of the project (B-Site) (location 9). (See Appendix B, Figure B-1, p. A-42.)

NOTES - Shadow and Wind

/1/ This section is based on a study entitled Wind Tunnel Study of the Pan Magna Plaza project, February 1986, prepared by Dr. Bruce White for Environmental Science Associates, Inc. A summary of the report is included in Appendix B, p. A-39; the complete report is on file and available for public review at the Department of City Planning, Office of Environmental Review, 450 McAllister St., Sixth Floor.

/2/ Equivalent windspeed is an hourly wind speed adjusted to incorporate the effects of gustiness or turbulence on pedestrians.

D. HISTORICAL, ARCHITECTURAL AND CULTURAL RESOURCES

HISTORICAL/ARCHITECTURAL RESOURCES

The project would demolish the Colombo Building on B-Site. The Colombo Building was rated "3" in the 1976 Department of City Planning Architectural Inventory, was rated B* by Heritage in their extended survey and was recommended for San Francisco City Landmark Status by a unanimous vote of the Landmarks Preservation Advisory Board in May, 1984. The Planning Commission tabled action on this recommendation in June, 1984.

Several objectives and policies contained in the Urban Design Element of the San Francisco Master Plan apply to the project, including: Objective 2, Policy 4, "Preserve notable landmarks and areas of historic, architectural or aesthetic value, and promote the preservation of other buildings and features that provide continuity with past development," and Objective 2, Policy 6, "Respect the character of older development nearby in the design of new buildings." The project would result in the demolition of the Colombo Building. The proposed structure on B-Site is intended to complement surrounding development, including Jackson Square.

CULTURAL RESOURCES

An archaeological resources report titled "Cultural Resources Evaluation: Pan Magna Plaza Development Project, San Francisco, California" was prepared for the proposed site by Allen S. Pastron, Ph. D., consulting archaeologist, and is on file with the Office of Environmental Review, Department of City Planning, 450 McAllister Street, 6th Floor.

- The investigation indicates the potential presence of significant cultural resources on both A- and B-Sites, dating from the Spanish-Mexican, Early American, and Gold Rush periods. There is also evidence that aboriginal remains and cultural remains from more recent periods may be discovered.

The proposed project would not involve excavation below the existing basement level on B-Site; on A-Site, the project would involve excavation about 15 ft. below the existing basement (which is approximately 10 ft. below grade). Excavation for the proposed project would intrude upon any artifacts and might damage the resource irretrievably. Further investigation would be needed to determine means for preserving/removing the resource intact.

See mitigation measures under Cultural Resources on p. 150 of this document for measures included as part of the project.

E. TRANSPORTATION

DEMOLITION, EXCAVATION AND CONSTRUCTION IMPACTS

During the estimated 22-month construction period, transportation impacts would result from truck movements to and from the site during demolition, excavation and construction activity. Demolition of the existing building on B-Site would require about five weeks and would generate an average of 10 truck movements per day in and out of the project sites, between 9:00 a.m. and 3:30 p.m. Excavation of both sites would require about four weeks and would generate an average of 45 truck movements per day in and out of the project sites, between 9:00 a.m. and 3:30 p.m. Construction activities (steel erection and finishing) would generate an average of 10 truck movements per day in and out of the project sites during the 20-month period. Deliveries of materials would occur between 9:00 a.m. and 3:30 p.m./1/

During the construction period, sidewalks fronting both project sites on Jackson, Kearny and Washington Streets and Columbus Avenue would be closed. The curb lane on each of these streets would be closed also, to provide a pedestrian detour. The Kearny Street and Columbus Avenue curb-lane closures would necessitate the temporary relocation of Muni bus stops. Lane and sidewalk closures are subject to review and approval by the Department of Public Works. Muni would also be consulted.

Material storage is proposed to be on IIs Lane, which would provide direct access to B-Site. A revocable encroachment permit from the Department of Public Works would be necessary to do this. Double parking of trucks on Kearny Street may occur while trucks unload material for A-Site.

The impact of construction truck traffic would be a slight lessening of the capacities of access streets and haul routes because of the slower movements and larger turning radii of trucks. Lane blockage on Kearny Street by queued trucks, if it were to occur, would reduce the capacity of this street and would interfere with the operation of Muni. Blockage during times of peak traffic flow, if it were to occur, would have greater

potential to create conflicts than during non-peak hours because of the greater peak-hour numbers of vehicles in adjacent lanes and vehicles (autos and buses) that would have to maneuver around the queued trucks; however, as stated above, all truck trips would be completed during non-peak hours.

Construction of the project would generate a maximum of 105 construction workers at the site at any one time./1/ Temporary parking demand by construction workers' vehicles, and impacts on local intersections from construction worker traffic, would occur in proportion to the number of construction workers who would use automobiles.

PROJECT IMPACTS

Travel Demand

On the basis of land use, the project would generate about 6,450 net new person trip-ends (pte) per day./2/ Travel generated by existing office and retail uses on B-Site (about 670 pte per day) has been subtracted from total new travel (about 2,130 pte per day) from the site to give the net new travel from the project./3/ About 5,890 of the net new daily pte would be from office and retail space in the project, while about 560 daily pte would be from residential space./4/ The trip generation calculations include travel to and from the project site by both visitors and employees of the project. Additionally, although expressed on a person trip-end basis, the trip generation includes all travel to and from the project in autos, service vehicles and trucks, on public transit and other modes (i.e., walking, bicycles, taxis, etc.). Projected outbound (peak commute direction) p.m. peak-period and peak-hour trips by mode expected to be generated by the project are shown in Table 4. About 880 new outbound trips from the project would occur during the p.m. peak-period, of which about 530 would occur in the p.m. peak hour./5/

Assignments to travel modes for the office portions of the project have been made on the basis of modal splits from the Downtown Plan EIR (EE81.3) for the years 1984 and 2000./6/ The modal splits were derived from data from the C-3 zoning district. The project block is adjacent to the C-3 District and contains uses similar to those in the C-3 district. Travel behavior from the project has been assumed to be similar to travel in the C-3 District because of the very close proximity of the site to the C-3 District. Although

the project would not be completed until 1988, the 1984 modal split has been used for the purpose of identifying impacts at the single-project level (as opposed to impacts at the cumulative level). The year 2000 modal splits have been applied to the project travel for the purpose of comparing project travel with cumulative future travel demand on the transportation system serving San Francisco (see Regional Cumulative Impacts, p. 111). The modal splits used were derived from aggregate data for the C-3 District, and thus represent an average condition. The actual modal split for travel from the project may vary from the C-3 District average. However, application of the average modal split data to project travel has been assumed to be sufficiently accurate for purposes of comparison.

TABLE 4: PROJECTED OUTBOUND TRAVEL DEMAND BY MODE FROM PAN MAGNA PLAZA PROJECT (pte/a/)

Travel Mode	P.M. Peak Period/b/ 1984 2000/c/		P.M. Peak Hour /b/ 1984 2000/c/	
Drive Alone	115	110	75	60
Car/Vanpool	90	95	55	70
Muni	180	160	100	90
BART	110	125	70	80
AC Transit	30	30	20	15
SamTrans	10	10	5	5
SPRR (Caltrain)	15	10	10	10
GGT Bus	20	20	15	15
Ferry	5	10	5	5
Walk Only/d/	295	300	170	170
Other	10	10	5	10
TOTALS (rounded)	880	880	530	530

/a/ Person trip-ends.

/b/ The peak hour occurs during the two-hour peak period of 4:00 to 6:00 p.m.

/c/ The year 2000 modal split accounts for changes in travel behavior which are assumed to occur as a result of growth in downtown San Francisco.

/d/ These trips are solely walking trips and are not made in combination with any other form of transportation. Destinations are to other places then just home.

SOURCE: Environmental Science Associates, Inc.

- After publication of the Pan Magna Plaza Draft EIR, the San Francisco Department of City Planning published a document which analyzed transportation behavior in the Chinatown area, Transportation Impact Analysis for the Proposed Chinatown Rezoning Plan, January 1987.
- Comparing trip data for the Chinatown Area to that for the C-3 District reveals a higher percentage of people who drive and ride Muni than other modes. Table 4A, below, presents year 2000 modal splits for the project as analyzed in the DEIR using the C-3 District analysis and compares them with the year 2000 modal splits for the project analyzed using the Chinatown analysis. The comparison indicates a higher amount of travel for most modes using the Chinatown modal splits; however, the Downtown Plan analysis uses projected outbound peak trips while the Chinatown analysis aggregates all trips (both inbound and outbound). Therefore, comparing the Chinatown modal splits with the Downtown Plan modal splits represents a conservative case for the Chinatown analysis.
- It is expected that actual travel demand from the project would be somewhere in between the two analyses as A-Site could be more similar to the uses in Chinatown and B-Site could be more similar to the uses in the C-3 District.

● TABLE 4A: COMPARISON OF YEAR 2000 TRAVEL DEMAND FROM PAN MAGNA PLAZA PROJECT USING DOWNTOWN PLAN EIR ANALYSIS AND CHINATOWN ANALYSIS AND YEAR 2000 TRAVEL DEMAND FROM ALTERNATIVE G USING CHINATOWN ANALYSIS

	DEIR Project		DEIR Project	
	Downtown Plan Analysis		Chinatown Analysis	
	<u>P.M. Peak</u> <u>Period/b/</u>	<u>P.M. Peak</u> <u>Hour/b/</u>	<u>P.M. Peak</u> <u>Period/b/</u>	<u>P.M. Peak</u> <u>Hour/b/</u>
Drive Alone	110	60	240	170
Car/Vanpool (shared ride)	95	70	150	90
Muni	160	90	320	215
BART	125	80	30	20
AC Transit	30	15	5	5
Sam Trans	10	5	10	10
SPRR (Caltrain)	10	10	5	5
GGT Bus	20	15	5	5
Ferry	10	5	5	-
Walk/c/	300	170	230	160
Other	<u>10</u>	<u>10</u>	<u>- 1</u>	<u>- 1</u>
Totals (rounded)	880	530	1,000	680
Total Daily	<u>6,450</u>		<u>6,015</u>	

/a/ Person trip-ends.

/b/ The peak occurs during the two-hour peak period of 4:00 p.m. to 6:00 p.m.

/c/ These trips are solely walking trips and are not made in combination with any other form of transportation. Destinations are to other places than just home.

SOURCE: Environmental Science Associates, Inc.

Local Transit

About eight Muni routes stop within two blocks of the project. Muni Metro and BART service in the Market Street subway are accessible via the Montgomery Street station about one-half mile south from the site. Figure 34 shows Muni routes in the project area. Photographic examples of p.m. peak-hour loadings on Muni vehicles are shown in Appendix D, Figure D-1, p. A-46.

As shown in Table 5, p. 114, Muni operations in the four corridors of San Francisco in the p.m. peak hour are currently in Level of Service D and E and BART is shown to be operating currently at Level of Service F transbay and in Level of Service D in the westbay. Table D-1, Appendix D, p. A-45, contains descriptions of the various Levels of Service for bus transit. In the p.m. peak hour, the project would generate about 100 new Muni trips and about 70 new BART trips outbound from the project site. Addition of the project p.m. peak-hour Muni riders to the existing (1984) Muni ridership would increase the loading ratios on Muni, but would not change the corridor transit Levels of Service. Muni riders from the project would not be sufficient to affect Muni operations. Addition of BART riders from the project to the existing BART ridership would increase the p.m. peak hour ridership; the project's BART riders would not change the loading ratio or Levels of Service.

Transit Corridor Analysis

The project would contribute to increases in transit ridership in the major transit corridors leading from downtown San Francisco. Existing peak-period and peak-hour transit ridership (see Table 5) would be increased by 0.1% to 0.3%, with the greatest increases from the project riders occurring in the Muni northwest corridor. Ridership increases of this magnitude would not be measurable against the day-to-day fluctuations in transit ridership and would not have a noticeable effect on transit levels of service. Transit impact caused by cumulative development are discussed in the Regional Cumulative Impacts section, p. 111.

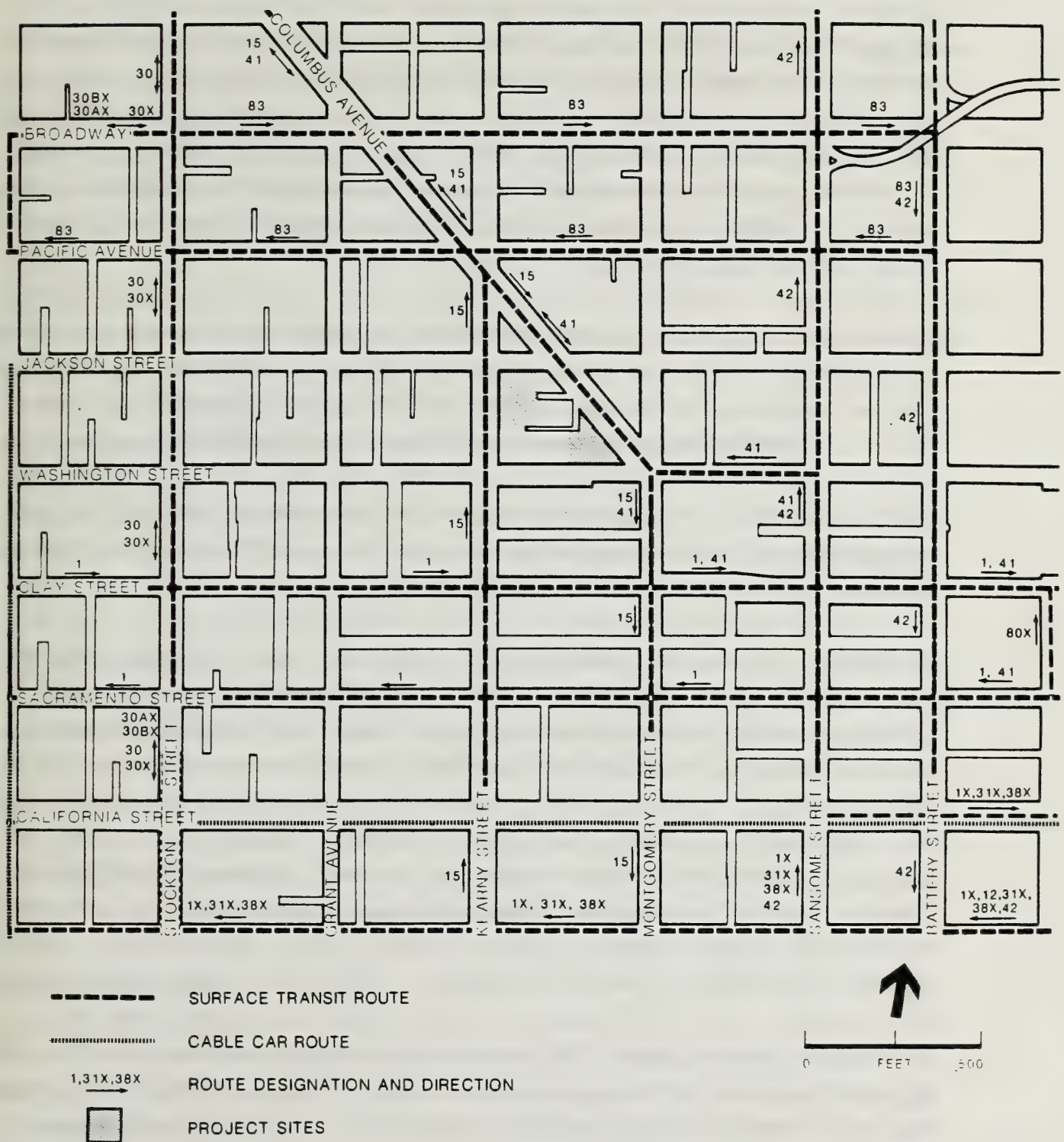


FIGURE 34

MUNI ROUTES IN PROJECT VICINITY

SOURCE: MUNI San Francisco Street Transit Map, June 1984

Project Transit Costs

Muni. The estimated 1981-82 (most recent available) net marginal cost (or increase in the deficit for Muni operations) per additional ride is \$0.50./7/ This deficit-per-ride figure, because it is a marginal cost, is appropriate for small increases in Muni ridership (such as that requiring one or a few additional vehicle trips). Assessments of costs that would result from cumulative development require the inclusion of additional cost factors and may be best projected using average costs./8/ It is reasonable to conclude that average costs would be significantly higher than marginal costs.

The project would generate about 83,200 peak-period peak direction rides annually in the year 2000, which would generate a cost deficit to Muni of about \$41,600, assuming that the cost-per-ride deficit remains the same./9/ (This conclusion should be qualified because the Muni deficit-per-passenger-trip figure is based on 1981-82 data, and because the total project-generated deficit is calculated only for those riders who use Muni as their primary mode of transportation, excluding riders who would use a combination of transportation carriers, such as Muni and Caltrain. More recent data that would allow a more precise estimate of costs are not available.)

On April 27, 1981, the San Francisco Board of Supervisors approved Ordinance 224-81 establishing the Transit Impact Development Fee (TIDF) to support the additional operating costs and capital improvements for Muni transit services associated with new downtown commercial development. The ordinance established a one-time fee of up to \$5.00 per gross sq. ft. upon occupancy of new office space within the greater downtown area. The Pan Magna project site is located within the fee assessment area. The TIDF ordinance has been in litigation almost since its inception. On January 4, 1985, the San Francisco Superior Court issued a decision upholding the ordinance. On March 12, 1985, the plaintiffs, a group of downtown property owners, appealed. Money has been collected pursuant to the ordinance, and is being deposited in an escrow account, pending resolution of the litigation. Under the ordinance, the project would generate about \$861,500 in one-time fee revenues to Muni. The fee is intended to recover additional transit costs for the entire economic life of a building, and thus cannot be compared directly to the annual Muni deficit discussed above. The fees collected under the ordinance would, however, reduce the amount of General Fund revenue support necessary for existing and future Muni operations.

The project would also offset Muni's annual operating deficit attributable to the project through its contributions to General Fund revenues, which would be derived from a variety of taxes levied on the proposed project. In the past, a portion of General Fund revenues have been allocated to Muni. The historical level of contribution of General Fund revenues to Muni could change, however, if the TIDF is upheld in court. Because of the variable relationship of the sources from which Muni receives operating funds, the annual General Fund contribution from the project to Muni cannot be quantified.

General Objective 1, Policy 6 of the Transportation Element states as a goal to "develop a financing system for transportation in which funds may be allocated without unnecessary restriction for priority improvements according to established policies." (p. 10) The project sponsor has agreed to participate in legally adopted funding measures for Downtown transit funding, proportional to demand created by the project.

BART. For the nine months ending March 31, 1985, the average net operating deficit per passenger trip for BART was about \$1.18./10/ On the basis of about 151,500 rides per year in the year 2000, the estimated annual BART deficit attributable to the project would be about \$178,700, assuming that the cost per ride deficit remains the same./11/ The project would generate a total of about \$12,300 in revenues to BART, including about \$2,900 in property tax revenues, and about \$9,400 from the 75% of the 0.5% transit sales tax allocated to BART. This amount does not include the remaining 25% of the 0.5% BART sales tax revenue distributed by MTC among BART, Muni and AC Transit. After subtraction of BART's revenues from sales and property taxes that would be generated by the project, the net operating deficit of BART due to the project would be about \$166,400. BART's operating deficit per passenger is likely to decline in real terms as planned service improvements become operational in the future.

Pedestrian Movements

The pedestrian entrance to the office uses in the building located on A-Site would be on Kearny Street, while the residential tower would have separate elevators and a separate entrance located on Jackson Street. The B-Site building entrance would be located on Columbus Avenue.

The project at full occupancy would generate a total of about 270 additional pedestrians on sidewalks fronting the site during the 15-minute peak period of the noon hour, and about 190 additional pedestrians during the p.m. 15-minute period. Of the total 270 pedestrian trips generated during the 15-minute peak noon period, 170 would be from the building located on A-Site and 100 would be from the building located on B-Site. Of the total 190 pedestrian trips generated during the p.m. 15-minute period, 120 would be from the building located on A-Site and 70 would be from the building located on B-Site. Pedestrian travel destinations were estimated on the basis of projected major travel modes. Pedestrian trips were assigned to sidewalks and crosswalks on the basis of these destinations.

Operating conditions on sidewalks and crosswalks have been evaluated in terms of pedestrian flow categories or regimen, which relate the density of pedestrians in a specific time period (pedestrians per foot of clear sidewalk width per minute) to the quality of pedestrian flow (the difficulty of maintaining walking paths and speeds on a sidewalk).^{/12/} Appendix D, Table D-2, p. A-49 shows the relationships among flow rates, walking speed, path choice, and interaction among pedestrians for each flow regime. Appendix D, Figure D-2, p. A-50, shows photographs of sidewalk conditions for each flow regime. Typically, an upper limit for desirable conditions is 14 pedestrians per foot per minute (p/f/m), defined as crowded, although conditions as high as 18 p/f/m, a congested condition in which pedestrians are subjected to extreme crowding, have been documented.^{/12/}

Table 6, p. 120, summarizes pedestrian flow conditions on sidewalks and crosswalks adjacent to the site at the intersections of Jackson and Kearny Streets and Columbus Avenue and Washington Street. The sidewalks and crosswalks adjacent to the project site currently operate in open and unimpeded conditions during both the noon-peak 15-minute period and 15-minute p.m. peak period with the exception of the crosswalk across Washington Street, which operates in the impeded range.^{/13/} Conditions on the sidewalks and crosswalks adjacent to the project following addition of the project pedestrian travel to the existing volumes would remain the same with the following exceptions: the Columbus Avenue sidewalk in front of B-Site would increase from Unimpeded to Impeded conditions during the noon peak; the Jackson Street and Kearny Street sidewalks in front of A-Site would increase from Open to Unimpeded conditions during the p.m. peak; and the Columbus Avenue sidewalk in front of B-Site and the crosswalk across Washington

Street at Columbus Avenue would increase from Unimpeded to Impeded conditions during the p.m. peak.

Local Intersection Analysis

Project impacts at the intersections closest to the project site would result from service-vehicle and pedestrian traffic and from traffic using the proposed 139 valet parking spaces on the two sites, 108 on A-Site and 31 on B-Site. The 108 spaces provided on A-Site would be in two basement levels accessible via a ramp from Jackson Street. The 31 spaces on B-Site would be in the basement; a ramp from Washington Street would provide access to these spaces. The Columbus Avenue and Montgomery Street intersection and the Columbus Avenue and Jackson Street intersection currently operate at LOS B, and the Kearny and Jackson Streets and Kearny and Washington Streets intersections operate at LOS A; these represent acceptable conditions. The project would increase the V/C ratio slightly at these intersections but would not change the LOS (see Table 7, p. 121). A description of Level of Service is contained in Appendix D, Table D-3, p. A-53.

Freeway On-Ramp Analysis

- Traffic operations at intersections serving freeway on-ramps near the project site would also be incrementally affected by project-related traffic (see Table 7, p. 121). During the p.m. peak hour, the intersections of Broadway and Sansome Streets and Clay and Battery
- Streets currently operate in Level of Service C during the p.m. peak hour. Project effects at these intersections would result in an increase in the Volume-to-Capacity ratio, but the Level of Service would remain the same. See p. 121 for a discussion of cumulative impacts on freeway on-ramps.

Freeway Corridor Analysis

The project would contribute to increases in traffic on the major freeways serving downtown San Francisco. Traffic generated by the project would increase total traffic on major freeways during the p.m. peak period and the p.m. peak hour by about 0.2%. Such increases would not be measurable against the day-to-day fluctuations in traffic volumes. Because the Bay Bridge eastbound traffic flow is functionally at capacity, the travel demand from the project would not be expected to increase the flows on the Bay Bridge in the peak hour; rather the East-Bay-bound auto traffic from the project would

most likely compete with and possibly displace existing users of the Bay Bridge into later portions of the peak period. This competition for access would occur at the on-ramps to the Bay Bridge and any displacement of existing users to later time periods would depend upon the time of arrival of project vehicles at the on-ramps. Freeway impacts caused by cumulative development are discussed in the Regional Cumulative Impacts section, p. 121.

REGIONAL CUMULATIVE IMPACTS

- Formerly cumulative analysis of transportation impacts has been conducted on the basis of a list of proposed development in the greater downtown area. The Downtown Plan EIR method is a transportation analysis process in which a forecast of employment growth, independent of a list of proposed projects, is used to forecast future travel./14/

The travel data presented in the Downtown Plan EIR transportation sections (and in the transportation analyses for this report) are projections of total demand on the transportation system serving San Francisco. The projections comprise three components of travel demand. Two of the components were developed through an intricate travel modelling process for the C-3 District of San Francisco. These first two components of travel demand are C-3-District work (employee journey to and from work) travel and C-3 District non-work (all other) travel. The third component is non-C-3-District travel, which was forecast through an analysis of regional trends adjusted for the effect of development in the C-3-District. Non-C-3 travel is defined as travel that has neither an origin nor a destination in the C-3 District. Thus, non-C-3 travel includes travel to and from other parts of downtown and trips through San Francisco from other parts of the region. Employment forecasts are not specifically used in the non-C-3 travel analysis.

Because of the magnitude of the information contained in the Downtown Plan EIR, it is necessary to summarize portions of that information in this document for better comprehension of cumulative transportation projections. The following discussion highlights the basic points of the cumulative future travel demand projections.

Summary of Downtown Plan EIR Method. The Downtown Plan EIR method projects future travel on the basis of modal splits that are assumed to change over time in response to

transit service improvements and to increased levels of peak-period congestion on auto facilities. The transit service improvements assumed to occur by the year 2000 correspond to the vehicle acquisition portions of the Five-Year Plans for Muni, AC Transit, SamTrans, CalTrain, and Golden Gate Transit. For BART, both the vehicle acquisition program and the trackage improvements (Daly City Turnback/Storage Facility and the KE track, also known as the "Oakland Wye") were assumed to occur.

The Downtown Plan EIR transportation analysis also assumes that regional auto use will continue to change over time in response to increasing levels of congestion on the bridges and freeways serving the City. The analysis projects a shift from single-occupant auto use (drive alone) for commuting to ridesharing (carpool, vanpool) and to transit use. The assumptions of continuing shift from auto to transit and ridesharing, most apparent in the year 2000 modal splits, are made on the basis of long-term trends in transit use in the San Francisco commute corridors. Census data show that in the period 1970 to 1980, transit use for commuting to downtown increased. Similarly, Bay Bridge data show that ridesharing has been increasing over the last seven years./15/ Thus, the shift to transit and ridesharing is well-established in San Francisco commute corridors.

The Downtown Plan EIR approach for forecasting future land use, employment, and residence patterns is based on a conceptual framework of the process of urban economic development. The analytical procedures incorporate a variety of types and sources of data and information concerning past, current, and likely future conditions regarding economic, real estate, demographic, and public policy factors./16/ The employment forecasts have been used as the basis for the travel demand modelling process. As described above, the C-3-District travel comprised two of the three components of total travel. Because of the use of the employment forecasts in the travel demand modelling process, the transportation projections for the year 2000 are independent of lists of cumulative development.

The travel demand modelling process comprises the following steps:

- Trip generation rates (empirical measures of total travel to and from a specific land use) were applied to C-3-District employment forecasts by business activity (i.e., different rates were used for various land uses).
- The total travel from the C-3 District was distributed to seven Bay Area zones on the basis of forecasts of future employee residence patterns and origin-destination patterns for non-work travel.

- Trips to each of the seven regional zones were assigned to travel modes on the basis of modal splits (distribution of travel over the transportation modes, auto, transit, etc.) developed from the C-3-District surveys.

The total future travel demand was calculated by summing C-3-District work and non-work travel and non-C-3-travel at sub-regional measuring points (called screenlines) located at or just beyond the San Francisco County Line (except for Muni and BART Westbay service, which were measured inside San Francisco, outside the downtown).

The non-C-3-travel demand was forecast through the use of growth factors developed on the basis of historic trends in regional and sub-regional travel.^{/17/} Historic growth rates (factors) have been used to project increases only for non-C-3-District travel at the regional screenlines. No other use of historic growth rates has been made in the transportation analysis. Because of the individual and unique nature of each of the transportation screenlines, each growth rate is based on data for that location. Thus, the growth rates for freeways project growth in auto trips, while the growth rates for transit project growth in ridership. Each of the historic growth rates inherently contains information about regional growth in travel patterns and thus incorporates not only growth from other parts of San Francisco, but from elsewhere in the region. As an example, the historic growth factor for trips southbound on US 101 includes travel that crosses the Bay Bridge or the Golden Gate Bridge as well as travel from San Francisco. However, the growth is projected as growth in auto travel and cannot be directly related to growth in employment in San Francisco.

Transit

The transit agencies serving downtown San Francisco carry approximately 60% of the peak-period employee work travel, as well as about 20% of the peak-period other travel. Table 5 shows p.m. peak-hour and peak-period loadings on the local and regional transit routes. The transit analysis calculates capacity on the basis of all runs leaving the C-3 District in the p.m. peak. For all of the transit analyses, only peak-direction vehicles are counted. The values shown in Table 5 are sums over the peak hour and the two-hour peak period. Within the peak hour, there would be periods of time when the loading ratios would be higher than those shown for the hour (peak-of-the-peak conditions). Individual transit vehicle loadings vary on a day-to-day basis because of fluctuations in ridership (demand) and because of variations in operating conditions caused by traffic congestion, equipment availability, and/or system breakdowns.

TABLE 5: OUTBOUND REGIONAL TRANSIT DEMAND AND LEVEL OF SERVICE

	1984			2000			
<u>Transit Agency</u>	<u>Riders</u>	<u>P/S/a/</u>	<u>LOS/b/</u>	<u>Demand</u>	<u>P/S</u>	<u>LOS</u>	<u>Project Percent/c/</u>
<u>P.M. Peak Hour</u>							
Muni							
Northeast	7,100	1.16	D	8,800	1.05	D	0.2
Northwest	8,200	1.26	E	10,100	1.25	D	0.3
Southwest	13,500	1.45	E	16,600	1.42	E	0.2
Southeast	5,300	1.06	D	7,400	1.01	D	0.1
BART							
Transbay	16,100	1.53	F	27,900	1.42	E	0.2
Westbay	7,700	1.10	D	10,100	1.06	D	0.2
AC Transit	9,100	0.94	C	10,500	1.08	D	0.2
GGT Bus	5,300	1.00	C	8,500	0.91	C	0.2
GGT Ferry	800	0.57	B	1,500	0.38	A	0.1
Tiburon Ferry	200	0.40	A	300	0.60	B	0.1
SamTrans	1,900	1.12	D	3,100	1.19	D	0.2
CalTrain (SPRR)	3,100	0.61	B	4,900	0.79	C	0.2
<u>P.M. Peak Period</u>							
Muni							
Northeast	12,600	1.06	D	15,500	0.95	C	0.2
Northwest	13,100	1.13	D	15,300	1.05	D	0.3
Southwest	23,300	1.31	E	28,700	1.29	E	0.2
Southeast	9,100	1.00	C	12,100	0.88	C	0.1
BART							
Transbay	25,800	1.54	F	44,100	1.40	E	0.2
Westbay	11,300	0.80	C	14,600	0.77	C	0.2
AC Transit	14,000	0.95	C	17,000	1.16	D	0.2
GGT Bus	7,600	0.90	C	12,200	0.81	C	0.2
GGT Ferry	1,000	0.56	B	1,700	0.33	A	0.1
Tiburon Ferry	300	0.60	B	500	1.00	C	0.1
SamTrans	2,900	1.12	D	4,500	1.15	D	0.2
CalTrain (SPRR)	4,500	0.68	B	6,200	0.77	C	0.2

/a/ Passengers per Seat is the ratio of total demand to seated capacity.

/b/ Level Of Service is scale ranging from A to F that relates P/S ratios to passenger loading conditions on transit vehicles (see Table D-1, Appendix D).

/c/ The percent of demand generated by the project.

SOURCE: Environmental Science Associates, Inc.

Because the transit system serving San Francisco also provides service to other parts of the Bay Area, there are competing and conflicting demands placed upon the transit network by riders with destinations other than Downtown San Francisco. The locations of the analysis screenlines are such that the amount of San Francisco travel on the transit system is at or near a maximum at each screenline. The location of the screenlines is such that it may appear that travel demand from other development in the areas served by the transit network may not be included in the cumulative analysis. BART is the only transit system analyzed that provides substantial service to destinations other than San Francisco. While it is true that eastbound, southbound, and northbound travel from downtown Oakland development cannot be counted at the eastbound transbay screenline, BART's ridership is most concentrated in the Transbay Tube (its maximum load point). Analysis has shown that the eastbound loadings experienced in the Transbay Tube equal or exceed loadings observed on the same BART lines at the next set of BART screenlines, which include all BART activity within the downtown area of Oakland. Thus, on the basis of maximum load point locations and system loading characteristics, use of the transbay screenline for San Francisco travel analysis is appropriate, since the maximum eastbound BART loadings occur at this screenline.

All other transit service analyzed provides radial service to San Francisco on an almost-exclusive (express) basis. Under the operating charters of Golden Gate Transit, AC Transit and SamTrans, the three transit agencies are not allowed to provide local service within the City and County of San Francisco (e.g., a person boarding in the City must remain on the transit vehicle until crossing the County line before departing). By its very nature, express service to San Francisco provided by transit agencies means that there are limited opportunities for riders to board and depart outside of San Francisco (e.g., most express service has a very limited service area where local service is provided). Consequently, the majority of riders on transit vehicles providing express service to San Francisco are destined for San Francisco. Increased commercial development in areas between the origins of the express routes and San Francisco has little effect on the ridership patterns of the express service since persons wishing to use transit to reach such new areas of commercial development would use local transit service or express service directed to the new development, not express service to San Francisco. Although the service provided by SPRR/CalTrain to and from San Francisco is a mixture of local and express service, the system functions similarly to, and has ridership characteristics similar to those of, the express bus service to and from the City.

The Level of Service concept, similar to that developed for highway operations, has been applied to both bus and rail transit. Passengers per seat (i.e., total passengers divided by the number of seats) has been used as the measure of effectiveness to define the various level of service ranges. Table D-1, Appendix D, p. A-45, shows the relationship between Level of Service and passengers-per-seat (P/S) ratios for bus transit systems.

Passengers-per-seat ratios are only one measure of adequacy of service. The constraints of operating on heavily used streets in and around the downtown cause transit-vehicle bunching, loss of running time and missed schedules, all of which reduce service, reliability, and ultimately, capacity. In some respects, this would not be evident from simple quantitative analysis. The data in Table 5, p. 114, are taken from observed operations, not scheduled service, which inherently incorporates the reductions in capacity from operational considerations. In addition to those inefficiencies inherent within the transportation system, there are other factors which would affect overall transit capacities. These include variability in daily and seasonal ridership for which an absolute capacity must be available, as well as transit riders who remain uncoun- ted because their transit trips both start and end beyond the screenlines used in this analysis. Daily fluctuations in fleet availability also affect system capacity.

During the p.m. peak hour in 1984, all of the transit agencies were found to be operating in Level of Service D or better, with the exception of BART transbay where conditions were found to be at Level of Service F, and Muni in the northwest and southwest corridors, where operations were found to be in Level of Service E.

P.M. peak-period conditions on transit in 1984 were found to be equivalent to or better than peak-hour conditions. In some cases, where demand remains at peak-hour levels during the two-hour period, the passengers-per-seat ratios in the two-hour period are higher than in the one-hour period. This anomaly is the result of express (or additional) service provided by transit agencies during the peak hour, but not during the entire peak period. An example of this type of operation may be seen on BART, where three extra trains operate in transbay service in the peak hour but not in the rest of the peak period. Another factor involved is the distribution of demand (ridership) at uniformly high levels over the peak-period.

Both transit demand and capacity have been assumed to increase during the period 1984 to 2000. The discussions of transit capacity increases for the agencies are based on the Five-Year Plans and Capital Improvement Plans of the various transit agencies; they appear in Appendix J of the Downtown Plan EIR, pp. J.25-J.26. This material, which is discussed below and summarized in Table 5, is incorporated by reference. The future capacities were developed by applying percentage increases, expected in the future, to observed existing capacity. Thus, to the extent that the existing conditions contain inherent capacity reduction for missed runs, the future capacity projections have taken into account the inability of the transit systems to provide 100% of scheduled capacity. As noted above, the Muni analysis calculates capacity on the basis of all runs leaving the C-3 District in the p.m. peak. For all of the transit analyses, only peak-direction vehicles are counted.

Future transit demand and loadings in the year 2000 are shown in Table 5, p. 114, for both the peak hour and the peak period. The total transit demand from the project would represent a maximum of about 0.3% of the total travel demand on the transit carriers in the year 2000, under these conditions.

Peak-hour transit demand on Muni in the year 2000 would increase about 25% over 1984 levels in the northeast, northwest and southwest corridors. Muni demand in the southeast corridor would increase about 40% between 1984 and 2000. Peak-hour demand on the other agencies would increase between 30% and 70% during the period 1984 to 2000.

Peak-period increases in demand would be between 15% and 70% from 1984 to 2000. Overall peak-period transit travel would be expected to increase about 30% between 1984 and 2000. Peak-hour and peak-period passenger loadings would be heavier than in 1984, although most systems would operate in acceptable conditions (Level of Service D or better). However, BART Transbay and Muni to the Southwest would be in Level of Service E during the peak hour and the peak period.

It is important to note that the Five-Year Plan improvements for the transit systems are designed both to provide for future demand increases, and to improve service levels from existing conditions. For new vehicles to expand system capacity rather than represent replacement on a one-to-one basis, operating revenues would similarly need to be

increased. During the year 2000 peak hour, Muni service to the southwest would exceed the desirable passengers per seat ratio of 1.25./18/ Although the transit demand in the corridors in excess of the desirable loading would be able to be accommodated under crowded conditions and thus would not be excess demand (that is, not beyond capacity), demand in excess of the desirable loadings would mean that additional transit service over that assumed to occur by 2000 would need to be provided to allow transit operations in the corridor to meet the goal set by Muni. To meet the goal of 1.25 passengers per seat in the peak hour, Muni would have to increase service by about 14% in the southwest corridor over the amount of service assumed to occur in 2000.

If transit service were not increased beyond the amounts assumed to occur by the year 2000 in the Downtown Plan EIR, transit operations (in terms of passenger comfort) would be worse than 1984 conditions. Peak-hour and peak-period passengers-per-seat ratios would be higher than 1984 ratios since service (in some corridors) has been assumed to increase as much as 80% between 1984 and 2000.

If the Downtown Plan's Goals regarding increased transit use were achieved, and the proposals in the Plan regarding transit service improvements were to be fully developed and in place, the impacts on transit agencies would be less than described above. If the Goals were achieved, transit agencies would experience greater levels of demand than under this analysis but overall passenger loadings would be lower (and within desirable levels) because of increased transit service availability that would come about if the proposals stated in the Plan are developed. Section V.E (Mitigation Measures) of the Downtown Plan EIR contains measures that would provide the additional transit service required to mitigate the above impacts.

I-280 Transfer Concept Program

The I-280 Transfer Concept Program (TCP) is a collection of changes to the transportation network in the corridor that was to be served by the completion of the I-80/I-280 interchange at the Bay Bridge. An EIR, certified on May 23, 1985 by the City Planning Commission, has been prepared that discusses eight alternative scenarios. Of the eight scenarios, three would include relocation of the Caltrain Peninsula commute service to a terminal either behind the Transbay Transit Terminal or at Rincon Annex,

four blocks to the east; several of the alternatives would substantially change and alter the transportation system along The Embarcadero and could remove the Embarcadero Freeway (State Route 480). Removal of the Embarcadero Freeway would alter the transportation network near the site as the freeway on- and off-ramps at Clay and Battery Streets and at Broadway and Sansome Streets would be removed. Removal of the Embarcadero Freeway would also include a redesign of freeway on- and off-ramps in the South-of-Market area. Refer to the I-280 TCP EIR for further discussion of the impacts of the various alternatives.

Pedestrian

On the basis of projections contained in the Downtown Plan EIR, sidewalk activity will increase by 31% over existing volumes in the project area. Sidewalks and crosswalks adjacent to the project would operate in the year 2000 in the open, unimpeded and impeded range during both the noon peak and the p.m. peak. The project would contribute 16% to 68% of the future volumes on the sidewalks and crosswalks surrounding the project block. Conditions would continue to be acceptable. (See Table 6.)

The potential for pedestrian-vehicle conflicts would be increased by the service-vehicle traffic and automobile traffic from the project crossing the Washington and Jackson Streets sidewalks. Pedestrian volumes on the streets are low, so the impact of project traffic would not be as great as it would be in a more heavily traveled pedestrian area, such as Columbus Avenue.

Intersection Traffic

Future traffic operations at intersections including those near freeway on-ramps serving the project vicinity are shown in Table 7. For the year 2000 projections, 1984 traffic volumes were increased by a 19% average growth factor based on the Downtown Plan EIR traffic analysis. The growth factor represents a worst-case, unrestrained auto-demand-condition for street traffic in the downtown and, as such, is probably higher than actual traffic growth may be in the future in the downtown. Motorists confronted with increased delays on surface streets would be expected to alter their travel patterns to use less congested routes (to the freeway ramps) or to travel at different times (to avoid periods of traffic congestion). Conditions at the intersections of Clay and Battery

TABLE 6: PEAK PEDESTRIAN VOLUMES AND FLOW REGIMEN (Project Side of Street)

	Total Width (feet)	Effective Width (feet)/a/	Existing		Existing Plus Project		2000/e/		
			p/t/m/b/	Flow Regimen/c/	p/t/m	Flow Regimen	p/t/m	Flow Regimen	Project Percent
<u>NOON PEAK /d/</u>									
Jackson Street Sidewalk	8.3	5.6	1.0	Unimpeded	1.9	Unimpeded	2.3	Impeded	40%
Kearny Street Sidewalk	12.5	9.5	0.5	Unimpeded	1.8	Unimpeded	2.0	Unimpeded	68%
Columbus Avenue Sidewalk	10.2	7.3	1.2	Unimpeded	2.9	Impeded	3.3	Impeded	50%
Washington Street Sidewalk	10.0	6.8	0.6	Unimpeded	0.8	Unimpeded	0.9	Unimpeded	16%
Crosswalk across Jackson Street	11.0	11.0	0.6	Unimpeded	1.2	Unimpeded	1.4	Unimpeded	40%
Crosswalk across Kearny Street	8.2	8.2	1.2	Unimpeded	1.9	Unimpeded	2.3	Impeded	32%
Crosswalk across Columbus Avenue	10.5	10.5	0.6	Unimpeded	1.7	Unimpeded	2.0	Unimpeded	28%
Crosswalk across Washington Street	9.25	9.25	2.1	Impeded	3.9	Impeded	4.6	Impeded	39%
<u>P.M. PEAK/d/</u>									
Jackson Street Sidewalk	8.3	5.6	0.3	Open	0.9	Unimpeded	1.0	Unimpeded	65%
Kearny Street Sidewalk	12.5	9.5	0.3	Open	1.3	Unimpeded	1.4	Unimpeded	68%
Columbus Avenue Sidewalk	10.2	7.3	1.0	Unimpeded	2.1	Impeded	2.5	Impeded	47%
Washington Street Sidewalk	10.0	6.8	0.2	Open	0.3	Open	0.3	Open	32%
Crosswalk across Jackson Street	11.0	11.0	0.5	Unimpeded	0.9	Unimpeded	1.0	Unimpeded	37%
Crosswalk across Kearny Street	8.2	8.2	0.8	Unimpeded	1.3	Unimpeded	1.5	Unimpeded	32%
Crosswalk across Columbus Avenue	10.5	10.5	0.5	Unimpeded	0.9	Unimpeded	1.1	Unimpeded	35%
Crosswalk across Washington Street	9.25	9.25	0.7	Unimpeded	2.6	Impeded	3.0	Impeded	38%

/a/ The effective width is the narrowest portion of the sidewalk and is calculated by subtracting the space taken by poles, planter boxes, people standing at windows, etc., from the total width.

/b/ Pedestrians per foot of effective sidewalk width per minute.

/c/ See Table D-2 and Figure D-2, Appendix D, for descriptions of pedestrian flow regimens.

/d/ Peak 15-minute periods.

/e/ Calculated using existing sidewalk widths.

SOURCE: Environmental Science Associates, Inc.

Streets and Broadway and Sansome Street would worsen to LOS D. Level of Service descriptions are shown in Table D-3, Appendix D, p. A-53. Peak-hour conditions would be expected to deteriorate at all of the intersections by the year 2000. Expanded areas of traffic congestion would disrupt surface Muni operations.

TABLE 7: PROJECTED PEAK-HOUR INTERSECTION VOLUME-TO-CAPACITY RATIOS (V/C) AND LEVELS OF SERVICE (LOS)/a/

<u>Intersection</u>	<u>Existing</u>		<u>Existing + Project</u>		<u>Downtown Plan (2000)</u>	
	<u>V/C</u>	<u>LOS</u>	<u>V/C</u>	<u>LOS</u>	<u>V/C</u>	<u>LOS</u>
Columbus & Montgomery	0.63	B	0.64	B	0.69	B
Columbus & Jackson	0.66	B	0.69	B	0.72	C
Kearny & Jackson	0.39	A	0.39	A	0.42	A
Broadway & Sansome	0.78	C	0.80	C	0.84	D
Clay & Battery	0.74	C	0.75	C	0.81	D
Kearny & Washington	0.44	A	0.47	A	0.52	A

/a/ Level of Service descriptions and relationship to V/C ratios are shown in Table D-3, p. A-53 of Appendix D.

SOURCE: Environmental Science Associates, Inc.

Muni operations would be adversely affected by increased congestion. Operation of Muni surface transit routes through the congested areas would be impeded; this would lead to decreased levels of Muni service since scheduled headways would not be met.

Regional Freeway Traffic

Analysis of traffic conditions at the regional screenlines has been conducted for both the p.m. peak hour and the two-hour p.m. peak period. A.m. peak traffic conditions at the regional screenlines have the effect of metering the amount of traffic that reaches the downtown from outside of the City. P.m. conditions are usually most severe on both freeways and streets within San Francisco, whereas a.m. peak conditions are most

severe at locations outside of the City. This analysis has therefore considered p.m. peak conditions as most critical to the quality of flow on downtown streets.

The regional freeway system that serves San Francisco is an extensive network of roadways that also provides service to most of the major urban centers in the Bay Area. Consequently, there are many areas of commute-related congestion, some of which may experience worse conditions than at the screenlines analyzed in the Downtown Plan EIR and in this document. As noted in the Downtown Plan EIR, the screenlines were selected on the basis of their relationship to travel leaving San Francisco and thus, by their definitions, the screenlines are points of maximum effect of travel from San Francisco; at points further removed from the screenlines, San Francisco travel would be a lesser percentage of the total and thus the overall effects of San Francisco travel would be less than at the screenlines.

Traffic demand at the regional screenlines in 1984 (see Table 8) during the p.m. peak hour was found to use between 90% and 100% of the available capacity on the freeways and bridges. Although the capacity of the Bay Bridge is calculated to be 9,000 vehicles per hour (vph), the 1984 peak-hour demand shown in Table 8 represents the effective capacity. The demand figures shown in Table 8 for 1984 for the one-hour and two-hour periods are averages of several days; thus, values for individual days may be different from the average.

Peak-hour freeway operating conditions in 1984 were found to be generally in Level of Service D to E conditions, which would indicate unstable flows in the 35 mph to 45 mph range. Table D-4, Appendix D, p. A-54, shows the Level of Service for freeway operations. Peak-of-the-peak conditions within the peak hour would be expected to be worse than the hourly conditions, because of surges in traffic demand during the peak hour. Conditions during the peak-period at the screenlines would be similar to those experienced during the peak-hour.

As shown in Table 8, traffic demand during the peak hour in the East Bay and Peninsula corridors would be expected to increase about 15% between 1984 and 2000. Peak-hour demand in the North Bay corridor would increase by about six percent between 1984 and 2000. The project travel demand, about 100 p.m. peak-hour and 150 p.m. peak-period

vehicle trip-ends, would represent about 0.2% of the total demand in each corridor in the year 2000. Both the East Bay and Peninsula corridors would have excess peak-hour demand that would not be met during the peak period./19/ The North Bay corridor would have excess demand in the peak period. Excess auto demand would result in either a spreading of the demand into the hours adjacent to the peak period or in increased transit and ridesharing use should additional transit service (beyond that assumed to occur by the year 2000) or ridesharing incentives be provided.

TABLE 8: OUTBOUND REGIONAL AUTO DEMAND

<u>Regional Auto Corridor</u>	<u>Capacity/a/</u>	<u>1984</u>	<u>2000</u>	
		<u>Volume/b/</u>	<u>Demand</u>	<u>Project Percent</u>
<u>P.M. Peak Hour</u>				
Bay Bridge (I-80)	9,000	8,540	9,790	0.2
Golden Gate Bridge (US-101)	7,200	6,740	7,150	0.2
US-101 (south of Harney Way)	8,000	7,390	8,400	0.2
I-280 (between Alemany Blvd. and San Jose Avenue)	8,000	7,610	8,650	0.1
<u>P.M. Peak Period</u>				
Bay Bridge (I-80)	18,000	17,880	19,330	0.1
Golden Gate Bridge (US-101)	14,400	13,870	14,850	0.1
US-101 (south of Harney Way)	16,000	14,200	16,530	0.2
I-280 (between Alemany Blvd. and San Jose Avenue)	16,000	13,620	15,890	0.1

/a/ Although the capacity of the Bay Bridge is calculated to be 9,000 vehicles per hour (vph), the 1984 peak-hour volume shown above represents the effective capacity.

/b/ The volumes for 1984 for the one-hour and two-hour periods are averages of several days and, thus, values for individual days may be different than the average.

SOURCE: Environmental Science Associates, Inc.

Operating conditions at the regional screenlines would be at or near capacity in Level of Service E. Traffic flow conditions would be expected to be very unstable and could experience temporary flow interruptions throughout the peak-period. Peak-of-the-peak conditions would be prevalent during the peak hour and might extend into the peak period. The overall two-hour commute period would not be expected to increase substantially in the future. Rather, the occurrence of peak-of-the-peak conditions, now less than one hour, would most likely expand to fill the one-hour peak.

OFF-STREET PARKING AND LOADING REQUIREMENTS AND DEMAND

Parking

The estimated parking demand (both long-term and short-term) from the C-3 District in 1984 was found to be about 45,300 spaces, which would occupy about 94% of the 48,000 parking spaces in and near the C-3 District. The short-term parking demand, while representing about 25% of the equivalent daily demand, is about 65% of the daily vehicle travel. Although the equivalent daily demand would leave about five percent of the parking supply vacant, surges in short-term demand (more travel in one period than in another period) can cause temporary localized overloads of parking facilities within various portions of the downtown, even though parking may be available elsewhere in the downtown.

The project would provide a total of 139 valet (or 69 independently accessible) parking spaces; 108 valet (or 54 independently accessible) spaces would be located on A-Site, and 31 valet (or 15 independently accessible) spaces would be located on B-Site. The project would create net new long-term parking demand for about 160 spaces and net new demand for 20 short-term spaces for a total demand of about 180 equivalent daily spaces. Of the total parking demand, office and retail uses would generate a demand for about 170 spaces and the residential units would generate a demand for about 10 spaces. There would be an on-site deficit of about 40 spaces (assuming valet parking). Twenty-four spaces on A-Site would be reserved for the residential units.

Because the sites are in the Washington Broadway Special Use District, and are each less than 20,000 sq. ft.,/20/ the code would require 24 parking spaces for the residential uses on A-Site, and would allow seven percent of the gross floor area of office and retail space for accessory use parking or 7,624 sq. ft. on A-Site, and 6,356 sq. ft. on B-Site (Planning Code Section 204.5(c))./21/ The total project would provide 139 valet (or 69 independently accessible) spaces. Of the 108 valet spaces on A-Site, 24 would be required (for the residential units), and a further 22 would be permitted as an accessory use; therefore about 62 spaces would be above the allowable number on A-Site. Of the 31 spaces on B-Site, about 18 would be permitted as an accessory use; the remaining 13 would be above the allowable number. As the number of spaces exceeds those permitted as an accessory use, Conditional Use (CU) authorization would be required for about 75 parking spaces.

The C-3 District is forecast to generate demand for approximately 58,000 equivalent daily parking spaces in the year 2000, an increase of 28% from 1984. Short-term demand would continue to represent about 25% of the total demand. The project parking demand would be equal to less than one percent of the total demand from the C-3 District (although it is not part of the C-3 total). As noted in the Downtown Plan EIR, the parking supply in the year 2000 has been assumed to increase to about 51,000 spaces. However, as shown in Table 8, p. 123, the analysis for the year 2000 forecasts excess auto demand in the peak hour and the peak period. If the excess demand is accommodated on transit or ridesharing, then the overall parking demand would decrease from the above estimate by about 2,300 spaces. Alternatively, if the Goals of the Downtown Plan are met, total parking demand in the year 2000 would be about 48,100 equivalent daily spaces, an increase of six percent over 1984. If the Goals were achieved, there would not be a parking deficit.

Loading

Table 9 shows total service vehicle travel and average hourly service-vehicle demand for the project, based upon data published in Center City Circulation Program: Pedestrian Circulation and Goods Movement./22/ The new buildings would generate a total of about 47 service vehicle stops per day. Average hourly loading space needs are given in terms of spaces per hour per 10,000 gross sq. ft. of building space; average demand for the project would be about 2.3 spaces per hour and peak hourly demand would be for 2.8 spaces.

TABLE 9: PROJECTED SERVICE-VEHICLE TRAVEL ATTRIBUTABLE TO THE PROJECT/a/

<u>Use</u>	<u>Space (GSF)/b/</u>	<u>Daily Stops/ 10,000 sq.ft. of GSF/b/</u>	<u>Daily Stops</u>	<u>Spaces/Hour/ 10,000 sq.ft. of GSF/b/</u>	<u>Average Spaces/ Hour</u>
Office	178,100	2.1	38	0.1	1.8
Retail	21,600	3.0	7	0.2	0.4
Residential	53,700	0.3	<u>2</u>	0.01	<u>0.1</u>
TOTALS			47		2.3

/a/ Service-vehicle travel has been included in total travel calculated for the project.

/b/ Gross sq. ft. of floor space.

SOURCE: Environmental Science Associates, Inc.; Department of City Planning, 1980, Center City Circulation Program.

Under the City Planning Code, A-Site would be required to provide one loading space; B-Site would not be required to provide any loading space. Two loading spaces are proposed on the first basement level on A-Site (with enough space for two additional service vehicles to wait). The project sponsor would request the Department of Public Works to designate the curb on Washington Street adjacent to B-Site as a loading zone.

NOTES - Transportation

/1/ Joe Erway, CEDEVCO, telephone conversation, February 27, 1986.

/2/ San Francisco Department of City Planning, Transportation Guidelines for Environmental Impact Review: Transportation Impacts, September 1983. This document describes the procedure used to calculate travel demand from the project. Trip generation rates of 18.1 person trip-ends (pte) per 1,000 gross sq. ft. of office space and 150 pte per 1,000 gross sq. ft. of retail space were used to generate travel from the project. The two trip generation rates are for independent land uses. When used to generate travel from more than one land use on the same site the rates may overestimate total travel to the site since a portion of the travel from each of the land uses may occur between land uses on the site and not leave the site. Such trips are referred to as "linked trips." The calculations for this project have not been discounted to account for linked trips and thus present a "worst-case" scenario. The September 1983 Transportation Guidelines are on file and available for public review at the Department of City Planning, Office of Environmental Review, 450 McAllister Street.

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/3/ Existing travel demand is estimated on the basis of the Transportation Guidelines.

/4/ The trip generation rate for the residential portion of the project is based on rates for elderly dwelling units in Caltrans District 04, "Sixth Progress Report on Trip Ends Generation Research Counts," 1970. A rate of four daily trips/unit was used. Modal splits for the residential portion of the project were based on retail modal splits as the residential units would be for elderly low income people and most trips would be for shopping.

/5/ The percentage of travel occurring in the peak period and the peak hour are from the Transportation Guidelines. Total travel during each of the periods has been adjusted to show only outbound (leaving the downtown area in the peak commute direction) travel. The outbound travel consists of all of the work-related travel and half of the other (non-work) travel.

/6/ San Francisco Department of City Planning, Downtown Plan Environmental Impact Report (EIR), EE81.3, certified October 18, 1984. This document is an analysis of projected growth in the C-3 District to the year 2000 under the Downtown Plan and five alternatives. The transportation analysis in the Downtown Plan EIR includes projections of future modal splits for work and other (non-work) travel for the p.m. peak period, peak hour, and daily time periods. This document is on file with and available for public review at the Department of City Planning, 450 McAllister Street.

/7/ This deficit-per-ride figure is based upon information provided in: Touche, Ross & Co., Transit Impact Development Fee Cost Study, Fiscal Year 1981-82, July 1983, Corrected September 9, 1983, and consultation with Bruce Bernhard, Chief Financial Analyst, San Francisco Municipal Railway, telephone conversation, October 11, 1984 and March 20 and May 13, 1985. The calculation of the peak period marginal deficit (additional cost per ride minus additional revenue per ride) was done by ESA.

/8/ According to Muni, the appropriate technique for determining the costs to Muni of cumulative development is an average cost analysis which would include both capital and operating costs. Application of this technique, however, is limited because relevant capital cost data are not available from Muni. Further, capital costs are difficult to allocate on a person-trip basis as capital expenditures occur from time to time in large amounts, not necessarily annually. The established method of allocating capital costs is through depreciation, which is based on historical depreciation costs, not replacement costs. Such an estimate would be low in comparison with the costs of new capital improvements required for a single passenger trip. The use of existing capital cost data would underestimate future capital cost needs. Existing Muni accounting statistics do not enable future capital costs to be calculated on a per-passenger-trip basis (Bruce Bernhard, Muni Chief Financial Analyst, telephone conversation, March 25, 1985).

/9/ The deficit due to the project would be: 330 peak-period trips per day x 252 working days per year x \$0.50 deficit = \$41,580. The cost deficit estimate is based on the assumption that essentially all vehicles are operating at capacity during peak periods and additional riders would require new vehicle trips. During off-peak periods, it was assumed that all vehicles operate with excess capacity, resulting in an average off-peak marginal

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cost of zero. These cost estimates are appropriate for project costs to Muni of a single office building. Assessments of costs that would result from cumulative development require the inclusion of additional cost factors and may be best projected using average cost data. Muni does not have data that would enable it to estimate the average cost per passenger trip. It is reasonable to conclude that average costs would be significantly higher than marginal costs.

/10/ Ward Belding, Supervisor, Office of Research, BART, telephone conversation, May 13, 1984. The \$1.18 average deficit per trip is based on all operating costs and revenues for the entire system and is not specific to San Francisco trips. Available data from BART do not enable peak and non-peak-period costs to be differentiated.

/11/ 601 BART trips per day x 252 days/year x \$1.18 = \$178,713.

/12/ Pushkarev and Zupan, 1975, Urban Space for Pedestrians, Cambridge, Mass., pp. 85-117.

/13/ Pedestrian counts were made by Environmental Science Associates, Inc. on Tuesday and Wednesday, May 21 and 22, 1985.

/14/ The Downtown Plan EIR contains about 50 pages of text devoted to the description of transportation impacts in the greater downtown area, as well as an additional 30 pages of text describing transportation mitigation measures. The information in this EIR is not intended to be a comprehensive summary of the transportation analysis in the Downtown Plan EIR, but rather summarizes portions relevant to the project and its contribution to cumulative impacts. For details and assumptions used to arrive at the data and results presented in the Downtown Plan EIR, see Vol 1, Section IV.E, Transportation Setting and Impact, Section V.E, Transportation Mitigation; Vol 2, Appendix J, Transportation and Circulation Analyses and Methodologies; and Volume III, Summary of Comments and Responses, of the Downtown Plan EIR, which are incorporated by reference into this report and summarized in the text as appropriate.

/15/ In 1977, peak average vehicle occupancy westbound on the Bay Bridge was 1.7 persons per vehicle. By 1983, in response to increasing congestion and increased travel and parking costs, peak average vehicle occupancy westbound increased to 2.1 persons per vehicle. Data are from Traffic Survey Series A-48 and MA-60, Spring 1977 and Spring 1983, Metropolitan Transportation Commission.

/16/ The Downtown Plan EIR contains extensive discussion of the methods and results used to forecast future C-3 District land use and employment. Vol 1, Sections IV.B, Land Use and Real Estate Development; IV.C, Business and Employment; IV.D, Residence Patterns and Housing; and Vol 2, Appendices G, Land Use and Real Estate Analysis; H, Business and Employment Analysis; and I, Theoretical Discussion of Housing Market Effects/Methodology for Forecasting Residence Patterns, of the Downtown Plan EIR, which contain detailed information about methods used to forecast future employment in the C-3 District, are incorporated by reference into this report and summarized in the text as appropriate. The employment forecasts in the Downtown Plan EIR for the year 2000 exceed the employment projected using the current list-based cumulative analysis, as the list cannot take into account projects not yet proposed.

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/17/ The analysis of historic trends in travel patterns is from the following sources: Metropolitan Transportation Commission, Travel Observations of the Bay Bridge Corridor, October 21, 1981; Homburger and Dock, Trends in Traffic Patterns at the Bay Bridge and Caldecott Tunnel, U.S. Department of Transportation, DOT-BIP-WP-32-3-77, July 1977; telephone survey of 500 drivers conducted in April 1980 by Golden Gate Transit, data supplied by Alan Zahradnik, Transportation Planner, on February 16, 1983; Office of the Auditor-Controller, Comparative Record of Traffic for the Month of November, May 27, 1937 through November 30, 1982, Golden Gate Bridge, Highway and Transportation District; San Francisco Municipal Railway Planning Division, Projections of Future Muni Demand and Vehicle Requirements, October 1982; San Mateo County Transit District, SamTrans Five-Year Transportation Development Plan: 1983-1988, April 1983; California Department of Transportation, CalTrain Caltrans/Southern Pacific Peninsula Train Service Five-Year Plan 1983-1988, July 1983; and traffic volume counts from San Francisco Department of Public Works, Bureau of Engineering, Division of Traffic Engineering and from 1983 San Francisco Cordon Count, JHK and Associates, July 1983.

/18/ San Francisco Municipal Railway, Short-Range Transit Plan 1984-1989, June 1984.

/19/ Downtown Plan EIR, Vol 1, Table IV.E.4, p. IV.E.36, contains discussion of the implications of excess demand at the regional screenlines.

/20/ San Francisco City Planning Code Section 161(d).

/21/ San Francisco City Planning Code Section 151. As the residential units are for senior citizens, only one-fifth of the parking requirement would apply. (Section 204.5(c) provides for accessory parking facilities.)

/22/ San Francisco Department of City Planning, 1980, Center City Circulation and Goods Movement, Working Papers 1, 2 and 3, and Final Report.

F. AIR QUALITY

Upon completion, the project would affect air quality in two ways. Emissions would be generated by project-related traffic, and by combustion of natural gas for building space and water heating. Transportation sources would account for over 95% of project-related emissions.

Table 10, below, shows projected daily emissions of air pollutants in the year 2000 from project-generated traffic, new development in the greater downtown projected by the Downtown Plan EIR (EE81.3, certified October 18, 1984), and total emissions projected for the entire Bay Area in 2000 by the 1982 Bay Area Air Quality Plan. The project would contribute less than 2% to the emissions generated by new greater downtown development, in 2000./1/

Nitrogen oxides (NO_x) and hydrocarbons (HC) are both chemical precursors of ozone. Motor vehicles emit more NO_x than HC, and emissions from building natural gas

TABLE 10: PROJECTED DAILY POLLUTANT EMISSIONS

Pollutant	Project 2000/b/	Emissions (tons per day) /a/	
		Increase Downtown 1984-2000/c/	Bay Area - 2000/d/
Hydrocarbons	0.010	0.6	428
Nitrogen Oxides	0.011	0.8	610
Carbon Monoxide	0.104	6.6	1,883
Particulates	0.019	1.3	649
Sulfur Oxides	0.002	0.1	233

/a/ Project and Downtown Plan emissions calculated using BAAQMD vehicular emission factors. Emissions of HC, NO_x, and CO include an assumed six minutes of idling time per vehicle trip. Emissions of TSP include dust disturbed from roadway surfaces.

/b/ Based on a weighted daily average of 13.1 miles traveled per trip.

/c/ Incremental emissions of greater downtown development, per the Downtown Plan EIR, Vol. 1, Table IV.I.2, p. IV.I.12.

/d/ Cumulative total emissions of Bay Area development, per ABAG, BAAQMD, MTC, 1982 Bay Area Air Quality Plan, pp. 42, 53 and 112.

SOURCE: Environmental Science Associates, Inc.

combustion would consist primarily of NO_x. As demonstrated by the LIRAQ (Livermore Regional Air Quality model) regional ozone simulations conducted for the 1982 Bay Area Air Quality Plan, an increase in the future NO_x emissions compared to HC emissions would lead to a decrease in ozone compared to present levels. This model has also shown that Bay Area ozone concentrations are expected to be within the federal standard in 1987, and thereafter. As future NO_x emissions from cumulative development in San Francisco would exceed future HC emissions, this development would not lead to an increase in total Bay Area ozone concentrations.

At the same time, total emissions of both NO_x and HC are expected to decrease in San Francisco. Total NO_x emissions would decrease in downtown San Francisco by about two percent from 1984 to 2000, but would increase in the Bay Area by about 5% from 1984 to 2000. It is possible that excess NO_x emissions generated by cumulative development (including the project) could increase ozone and/or nitrogenous oxidant concentrations further downwind, outside the Bay Area. In addition, NO_x emissions generated by cumulative development (including the project) throughout the Bay Area could increase

acid rain further downwind, outside the Bay Area, though to a relatively small extent due to the magnitude of the increase and to dilution over time and distance.

In 2000 (according to the Downtown Plan EIR), area-wide traffic volumes in the downtown area would increase by about 15% over 1984 volumes; average traffic speeds would decrease by about two mph from 1984 speeds. However, in 2000 the average vehicle is expected to emit 43% less carbon monoxide (CO) than in 1984 due to ongoing state and federal emissions controls.

- CO concentrations at 11 representative intersections in the downtown study area, as analyzed in the Downtown Plan EIR, would decrease from 1984 to 2000. The Downtown Plan EIR analysis found that CO concentrations at 10 of the 11 intersections would be within the state and federal eight-hour standards in 2000, while one intersection would continue to violate those standards. However, a reanalysis of this intersection using updated emission factors supplied by the Bay Area Air Quality Management District indicates that the violation would be eliminated as a result of the statewide Vehicle Inspection and Maintenance Program.

Curbside CO concentrations at selected intersections that would be affected by project-generated traffic, and by cumulative development traffic, were projected for conservative conditions and are compared with the ambient standards in Table 11. These projections were calculated using a revised version of the Modified Linear Rollback (MLR) method which was developed for the Downtown Plan EIR.

Currently, the eight-hour CO standard is estimated to be violated at the Broadway/Sansome and Battery/Clay intersections. CO concentrations are predicted to be less in 2000 than in 1984 and would not violate the standards at either intersection in the future.

The California Legislature has mandated a biannual inspection and maintenance (I/M) program, which applies to most cars and light trucks in California. This program went into operation in March 1984. Vehicles covered by the legislation must undergo a check consisting of a visual inspection of the vehicle's emission control system, measurement of tailpipe emissions while the vehicle is idling, and comparison of the measured emissions rates to the allowable limits for the appropriate year of manufacture and model of vehicle. Vehicles must have the required emission control equipment and must meet the specified standards for hydrocarbons and carbon monoxide. If required emissions control

TABLE 11: EXISTING AND PROJECTED CURBSIDE CARBON MONOXIDE CONCENTRATIONS AT SELECTED INTERSECTIONS

Intersection	Averaging Time	Concentrations (ppm)/a/	
		Existing Plus Project 1984	Downtown Plan 2000/b/
Columbus/Montgomery and Washington	1-hour	11.4	8.2
	8-hour	8.7	6.1
Broadway/Sansome	1-hour	13.9	9.9
	8-hour	<u>10.7</u>	7.4
Columbus/Jackson	1-hour	9.2	6.8
	8-hour	7.3	5.1
Battery/Clay	1-hour	13.0	9.2
	8-hour	<u>10.3</u>	7.1

/a/ Calculations for all scenarios were made using a revised version of the Modified Linear Rollback (MLR) method described in the Downtown Plan EIR. Background concentrations were calculated to be 7.4 ppm for one hour and 5.7 ppm for eight hours in 1984, and 5.7 ppm for one hour and 4.1 ppm for eight hours in 2000. Underlined values are in violation of the state or federal CO standards. The one-hour state standard is 20 ppm, the one-hour federal standard is 35 ppm, and the eight-hour state and federal standards are 9 ppm.

/b/ Based on the economic forecast methodology contained in the Downtown Plan EIR, Vol. 1 Table IV.I.3, p. C&R-I.8. The project would be contained within this forecast.

SOURCE: Environmental Science Associates, Inc.

equipment is not present it must be installed. If all required equipment is in place but the vehicle's emissions exceed the standards, the owner must pay a maximum of \$50 for service intended to result in compliance.

- By taking future CO reductions into account, the current analysis predicts that none of the intersections which have been modeled within the greater downtown would violate CO standards in 2000.

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Emissions of total suspended particulate (TSP) resulting from construction and from vehicle trips generated by the project and cumulative development would increase TSP concentrations, which could increase the frequency of TSP standard violations in San Francisco, with concomitant health effects and reduced visibility./2/

Emissions of sulfur oxides (SO_x) generated by the project and cumulative development would not bring San Francisco's sulfur dioxide (SO_2) concentrations measurably closer to violating the standard.

- The 1982 Bay Area Air Quality Plan contains strategies which consist primarily of HC and CO emission controls on stationary sources and motor vehicles, and transportation improvements, and are aimed at attaining the federal ozone and CO standards. As discussed above, emissions associated with the project and with cumulative downtown development are not projected by this EIR or the Downtown Plan EIR to increase ozone concentrations, and thus would not conflict with the objectives of the 1982 Bay Area Air Quality Plan regarding ozone. The Downtown Plan EIR includes a mitigation measure requesting BAAQMD to install CO "hot spot" monitors downtown in order to validate the model. This winter, the City monitored CO and counted traffic at the Sixth and Brannan intersection. Once these data are analyzed, it should be possible to validate and recalibrate, if necessary, the model projections. Until then, a determination of whether cumulative downtown development would conflict with the the objectives of the 1982 Bay Area Air Quality Plan regarding CO cannot be made.

NOTES - Air Quality

/1/ Impacts anticipated from cumulative downtown development have been analyzed in the Downtown Plan Environmental Impact Report (EIR), (EE81.3, certified October 18,

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1984). The air quality setting, impacts and alternatives discussion in the Downtown Plan EIR (Vol. 1, pp. IV.I.1-19 and VII.I.1-8; Vol. 2, pp. O.1-9; Vol. 3, Part 1, pp. C&R-I.1-11) is summarized in the text of this EIR and incorporated by reference herein.

/2/ State particulate standards were changed in 1983 to concentrate on fine particulate matter, which has been demonstrated to have health implications when inhaled. Until the State adopts a method for monitoring fine particulate matter, it is not possible to determine what proportion of TSP in San Francisco would be subject to review against the new standards, whether new standards would be violated, or what the health implications would be.

G. EMPLOYMENT AND HOUSING

EMPLOYMENT

Direct Project-Related Employment

At full operation, the project would accommodate approximately 750 permanent full-time jobs for office, retail and janitorial/service functions (see Table 12, p. 135). The

- 47 employees currently on B-Site would be displaced. There would be a net increase of about 703 employees./1/

Secondary employment and income would result from permanent project employment; through the multiplier effect, each employed person would generate additional employment through expenditures for goods and services. On the assumption that the new office jobs on-site would be primarily in the finance, insurance, and real estate (FIRE) sector, about 1,530 additional jobs in other sectors of the Bay Area economy would result from the project./2/ Thus, the total number of Bay Area jobs that would be supported by growth in downtown employment due to the project would be about 2,250 (about 720 net new project jobs plus 1,530 jobs from the multiplier effect).

Project construction would require about 130 person-years of labor, an average of about 60 to 65 construction jobs over a 22-month construction period. About 115 additional person years of employment would be generated in the Bay Area as a result of the multiplier effect of project construction./3/ Because the project would include CDBG funding, the project sponsor would be required to comply with the San Francisco Office of Community Development's rules and regulations pertaining to hiring, contract administration, affirmative action and wage rates./4/

TABLE 12: PROJECTED PERMANENT EMPLOYMENT AT THE PROJECT SITE

<u>Use</u>	<u>Building Space/a/</u>	<u>Total Project</u>	<u>Estimated Employees</u>
		<u>Space per Employee/b/</u>	
Office	178,100	268 /c/	665
Commercial/Petail	21,614	350	62
Maintenance and Building Management, and Parking	307,000	12,500 /d/	<u>25</u>
TOTAL EMPLOYMENT			752

/a/ Space estimated from Table 1, Project Description.

/b/ Gross sq. ft. of building space per employee. C-3 District employment density factors from Downtown Plan EIR.

/c/ Density for all office activities in 2000, including both management/technical office and trade/customer service office, and incorporating an average five percent vacancy factor.

/d/ One service worker per 12,500 sq. ft. (California Office of Planning and Research, Economic Practices Manual, January 1978).

SOURCE: Environmental Science Associates, Inc.

Cumulative Employment

Employment in the C-3 District has been forecast for the year 2000 in the Downtown Plan EIR./5/ The employment forecast incorporates changes in types of businesses locating in the C-3 District, intensity of use of space, and local, national and international economic trends. A total of 372,000 jobs in the C-3 District is forecast for the year 2000, an increase of 91,200 jobs over the 1984 level. Because the project is not in the C-3 District, jobs in the project are not included in this total. The proposed project would provide approximately 720 net new jobs in the year 2000 (based on projected employee densities), which would be equivalent to about 0.2% of total year 2000 jobs in the C-3 District.

HOUSING

Pre-Project Effects

The proposed project results from many years of negotiation among the project sponsor, city agencies, and the I-Hotel Block Citizen's Advisory Committee over the disposition of the site which formerly contained the International Hotel (I-Hotel). (Details of the Memorandum of Understanding executed in regard to the project's housing component are discussed below; the Memorandum of Understanding is included in Appendix E.) The I-Hotel was a low-cost, long-term residential hotel occupying the northern lot of the project's A-Site. Tenants were evicted from the 164-unit hotel on August 4, 1977. The I-Hotel was demolished in 1979. The other two vacant lots on the two sites (lots 5 and 11) were also occupied by low-cost, long-term residential hotels. Lot 5 (on B-Site) was occupied by a hotel (the Bell) with about 70 units, all of which were vacant for five years prior to its demolition in 1979. Lot 11 (on A-Site, adjacent to the I-Hotel), was occupied by a hotel (the Victory) with about 30 units, which also was demolished in 1979.

Projected Housing Demand

To the extent that the project would attract out-of-area employees and contribute to the formation of additional households by existing area residents, it would also contribute to increased local housing demand.

Not all of the project's about 720 net new employees would seek housing in the City. Some of the employees may already be working in San Francisco and living either within or outside of the City. On the assumption that the project's housing demand would be that projected by the Office Affordable Housing Production Program, the project could create a net demand for about 67 housing units in San Francisco.

Fulfillment of Housing Requirement

San Francisco Ordinance 358-85 requires the sponsor to participate in the City's Office of Affordable Housing Production Program (OAHPP). This program is designed to offset the project's contribution to the housing market impacts of cumulative downtown office development. The OAHPP requires that the project sponsor construct housing or pay a

fee to the City to subsidize housing development. The OAHPP Ordinance does not provide direct housing assistance to on-site workers. The OAHPP is intended to expand construction of market-rate and affordable housing units throughout the City.

Based on the OAHPP formulae contained in the Ordinance, the requirement for this project would be the payment of \$920,082 ($172,300 \text{ sq. ft.} \times \$5.34 = \$920,082$) or the development of 67 housing units ($172,300 \text{ sq. ft.} \times 0.000386 = 67 \text{ units}$), at least 62 percent of which must be affordable to households of low or moderate income for 20 years.

The project sponsor intends to meet this requirement through the 120 subsidized senior housing units (80 single units and 40 double units) proposed as part of the project to be subsidized for 40 years.

These housing units are intended to meet the agreement reached in the Memorandum of Understanding (MOU) executed in July 1984 among Mayor Feinstein, the project sponsor (Four Seas Investment Corporation), and the Citizens' Advisory Committee on the International Hotel (see Appendix E). The agreement establishes the Mayor's financial commitment and the Advisory Committee's support of the sponsor's then-proposed project consisting, in part, of 140 units of elderly housing for 160 people for 40 years.

The MOU gives a general description of units: that they shall occupy the upper seven floors of a 12-story building to be constructed on the I-Hotel site. Each unit shall have self-contained kitchen and bathroom facilities, and be metered individually for electricity. The 120 single-person units shall be approximately 225 net sq. ft. and the 20 double units shall be approximately 325 net sq. ft. The rental structure, which shall remain in place for 40 years, is specified as \$1 per-sq.-ft. per month, exclusive of electricity, for all units; rents shall be fixed for the first five years of the project and thereafter increase at a rate equal to 80% of the annual Consumer Price Index (for all consumers in the San Francisco-Oakland metropolitan area, as published by the Department of Labor). The MOU further stipulates that bonafide elderly and disabled tenants living in the I-Hotel at the time final eviction notice was served will be given first priority for occupancy.

The project as proposed differs from that outlined in the MOU because of several considerations, including the need to lower the building on B-Site to keep the project from casting any new shadow on Portsmouth Square, and the desire to keep the housing from

IV. Environmental Impacts

being "high-rise." The project as proposed has fewer units (120 as opposed to 140); however, the same number of people would live in the residential component (160). Single units in the project would be about 310 sq. ft., double units about 360 sq. ft.

In return for the pledge to construct 140 subsidized senior housing units, the Mayor agreed in the MOU to recommend to the Board of Supervisors an allocation of \$1.5 million from the 1985 federal Community Development Block Grant (CDBG) program for the construction of one floor of residential units. The Mayor shall also recommend to the Board that tax exempt bonds with an interest rate not exceeding 10.5% be issued by the City to assist the housing portion of the development. Finally, the Mayor agreed to support the provision of any assistance necessary to assure that the former tenants of the I-Hotel pay no more than 30% of their income for rent in the new development; the City's cash contribution for this purpose shall not exceed \$40,000, according to the agreement. As a participant in the MOU, the Citizens' Advisory Committee on the International Hotel agreed to support the \$1.5 million CDBG allocation, as well as the overall development package as proposed by the sponsor.

Housing Market Implications in Chinatown

The project would provide low-cost housing for 160 persons, thereby helping to offset the demand for such housing in Chinatown. While the project would supply needed affordable housing, the housing provided would be up to about 145 units fewer than originally existed on the sites. Stronger controls on the demolition of residential hotels have been adopted by the City since the demolition of the on-site buildings.

CUMULATIVE AND INDIRECT EFFECTS

Future Residence Patterns For San Francisco

Employment growth and building development in downtown San Francisco will result in more employees working and living in the City. Over time, more existing residents will take San Francisco jobs and others who take San Francisco jobs will move into the City.

The future residence patterns described below are quantified and provide the basis for the qualitative conclusions about the housing market implications of downtown growth described in the following subsection. Because the residence patterns can be quantified for both cumulative development and for the increment of growth represented by the project, this allows an estimate of the project's contribution to the impacts of cumulative growth.

Downtown Plan Forecast as Cumulative Context

Forecasts of residence patterns in the year 2000 were prepared for the Downtown Plan EIR./6/ These forecasts incorporate future housing, labor force, and employment patterns in San Francisco and throughout the region and consider changing demographic, housing market, and transportation factors.

Growth expected throughout the region was included in the Downtown Plan EIR analysis of the housing impacts of C-3 District growth. The approach was to use ABAG's regional employment forecasts to describe the growth that is expected to occur by the year 2000. These forecasts incorporate the plans and projects that are expected to be completed by 2000 as well as land use policies from all Bay Area communities. They also include future employment in projects as yet not conceived or proposed. Further, they account for the net result of decreases in employment as firms go out of business or cut back on operations and increases in employment accommodated by new development. They also account for changes in the use of existing space./7/

This approach provides a cumulative employment context that is consistent with forecasts of expected future housing and labor force throughout the region. To assess housing impacts, it is important that expected growth of employment be analyzed within the context of expected growth of the housing supply and of the region's workforce for consistent time periods. The Downtown Plan forecast approach to cumulative impact assessment recognizes that growth besides that in the C-3 District (employment growth in greater downtown San Francisco, the rest of the City and the region) will also be competing for labor and housing in San Francisco and the rest of the region. ABAG's regional housing supply and labor force forecasts were used to provide the future context for areas outside of San Francisco.

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According to the Downtown Plan EIR forecasts, approximately 189,000 C-3 District workers would be living in San Francisco in 2000. This represents an increase of 30,000 City residents employed in the C-3 District over the 159,000 estimated for 1984, a 19% increase./8/ Relatively more employed San Franciscans would be employed in the C-3 District; the percentage of all employed San Franciscans who hold C-3 District jobs would increase from 45% in 1984 to 47.5% in 2000. Relatively fewer C-3 District jobs would be held by San Franciscans. The percentage of all C-3 District jobs held by San Franciscans would decline from 55.5% in 1984 to 50.2% in 2000. These changes would be the result of cumulative development and employment growth in the C-3 District between 1984 and 2000. Although comparable forecasts have not been prepared for downtown areas outside the C-3 District, the same patterns of change are expected to occur in these areas as in the C-3 District portions of the downtown. The number of San Francisco residents working in downtown will increase, the percentage of employed San Franciscans working downtown will increase, and the percentage of downtown jobs held by City residents will decline.

It is important to understand the difference between the two percentages above. In each case, the same estimate of the number of jobs held by San Francisco residents is compared to an estimate for a larger group: to all employed residents of the City in the first instance and to all employment (in the C-3 District or the greater downtown) in the second. These percentages both describe the same employment situation, but from different perspectives. The percentage of jobs held by City residents is used more often, primarily for transportation analysis. The percentage of City residents who work in downtown San Francisco is used less often. This latter perspective is a more direct measure of the role of downtown jobs in employing San Francisco residents.

The residence patterns characteristics of future occupants of the Pan Magna Plaza project are likely to be similar to those of the nearby C-3 District. Assuming residence patterns similar to those of the nearby C-3 District activities, approximately 343 of the 752 project employees would be San Francisco residents. The proposed project would be located outside the C-3 District and is thus not included as part of the C-3 District residence patterns forecasts quantified above. Nevertheless, the growth represented by the project and the distribution of this growth by place of residence is accounted for in the cumulative housing market impact assessment./9/

Housing Market Implications in San Francisco/10/

There is a complicated series of interactions between employment growth and the housing market impacts of that growth. Throughout this process, adaptations or changes in conditions can be identified, but cannot be solely attributed to employment growth.

With continued employment growth there would be additional demand for San Francisco housing from people with strong preferences for living in the City and with the ability and willingness to pay for housing. This demand would be added to an otherwise competitive market with relatively high prices/rents.

At the same time, additional housing will be produced in San Francisco. There would be more additional supply relative to additional demand in the future than in the past. The primary reason is that housing market factors together with local policies and redevelopment programs are expected to support a larger addition of housing in the City than occurred in the past two decades. Nevertheless, San Francisco is unlikely to accommodate all of the households that would otherwise choose to live in the City. This is explained by the City's role as the employment center for a large region, by the limited land availability in the City, and by the higher costs of producing housing in San Francisco.

Downtown employment and employment growth will continue to be among the factors supporting a competitive housing market. It is unlikely that changes in housing demand due to downtown growth alone would be the cause of significant changes in prices and rents. Future housing prices and rents will depend on other factors besides downtown employment growth (such as interest rates and local land use policies and development costs throughout the region).

Not all of the additional downtown workers would live in San Francisco; however, some would choose to do so. Many of the additional workers would be willing to pay higher prices for City housing to save on the time and cost of commuting from a more outlying location. Many of the additional workers preferring to live in San Francisco would be able to pay more for housing than some current residents.

Those workers who choose to live in the City would compete for the existing supply of housing. Those with greater financial resources would support the production of housing by the private market. Those with less financial resources would add to the

competition for the stock of housing available at prices and rents below those needed for new construction. To the extent that prices/rents remain below this threshold, the supply of these types of units would not be expanded. Instead, prices/rents of existing units would be somewhat higher, occupancies would be higher (more people per unit because children live at home longer, more people live together, etc., and/or lower vacancies), and there would be pressures to upgrade the existing stock.

Competitive market pressures would be greatest for rental and for-sale housing priced below average, particularly for units below the threshold prices/rents for new housing production. Increased competition in an already competitive market, the relatively high threshold for new construction, and the large pool of consumers (not just downtown workers) with preferences for the older housing stock in San Francisco, all would result in more housing consumers seeking these types of units. The purchase and upgrading of lower-cost older housing is the first step in the process of neighborhood change known as gentrification. Often, existing lower-income residents can be "priced out" of their housing in the upgrading process.

Higher prices and rents, particularly for the relatively lower-cost housing in older neighborhoods, would have various implications over time, for those in the housing market as well as for other existing residents. Some people would decide not to move into the City and some existing residents would move out of the City for more acceptable housing elsewhere. Many individuals would continue to live in San Francisco and pay higher prices/rents for the same City housing. Still others, those unable or unwilling to pay more, would accept City housing which does not fully meet their preferences or needs. Those with the fewest resources to pay for housing (low and some moderate income households) would bear the greatest share of the negative impacts of a housing market with higher prices/rents. These impacts vary - household could move to less satisfactory housing in the City or elsewhere, or more household members could have to contribute to housing expenditures (either within the existing household or because people decide to live together to combine their incomes). It is more likely that the poor will continue to live in the City, although in more crowded or otherwise inadequate housing, than move outside the City. And finally, owners of existing units would benefit to the extent that their housing appreciates. It is not possible to quantify how many households would be affected in each of these ways.

This scenario of future housing market conditions in San Francisco implies that housing affordability will continue to be a problem for many of the City's households. The additional demand due to downtown employment growth would add to a future housing market situation in which many households, particularly those with incomes below the threshold needed to support new production, are expected to be paying a larger percentage of their incomes for housing or accepting lesser housing services than in the past.

Generally, those households with fewer financial resources available to pay for housing would make the most sacrifices in adapting to more competitive market conditions. They have less ability to compete for housing and fewer housing options. San Francisco currently has and will continue to attract a large number of persons that will be faced with these difficulties in securing housing. They include renters, younger persons, those holding entry level jobs, the elderly and others on fixed incomes, newly arrived immigrants, as well as other poor and unemployed persons.

The proposed project, as part of the future pattern of downtown office development, would contribute to these housing market impacts. The project's individual contribution cannot be separately identified.

Regional Perspective on Residence Patterns and Housing

The residence patterns of San Francisco workers can also be considered from a regional perspective. In fact, future labor force, housing and employment throughout the region were important factors in the Downtown Plan EIR residence patterns forecasts. Expected trends in labor force participation, workers per household, housing production, and employment growth provided the future regional context in which the Downtown Plan EIR forecasts were prepared.

Table 13 presents residence patterns forecasts for C-3 District workers as prepared for the Downtown Plan EIR and compares these forecasts to forecasts of the total employed population in each part of the region prepared by the Association of Bay Area Governments (ABAG)./7/

The Downtown Plan EIR 1984 estimates and forecasts for 2000 (first three columns on the left) indicate that the largest number of C-3 District workers would live in San Francisco, followed by the East Bay, the Peninsula, and the North Bay. The largest increase of C-3

TABLE 13: C-3 DISTRICT WORKERS BY AREA OF RESIDENCE COMPARED TO EMPLOYED POPULATION IN EACH AREA 1984 AND 2000

Area of Residence	Number of C-3 District Workers/a/		Employed Population/b/		Percent of Total Employed Population In Each Part of Region	
	Total 1984	Total 2000	Change 1984-2000	1984	2000	Change 1984-2000
San Francisco	139,000	189,000	30,000	353,000	404,000	49,000
East Bay	73,000	110,000	37,000	1,032,000	1,407,000	375,000
South Bay	35,000	48,000	13,000	1,040,000	1,326,000	286,000
North Bay	19,000	29,000	10,000	269,000	393,000	124,000
TOTAL	286,000 /c/	376,000 /c/	90,000	2,696,000	3,530,000	834,000
				11 %	11 %	11 %

NOTE: Table IV.D.20 in the Downtown Plan EIR (p. IV.D.81h) presents a similar comparison showing the detail for the nine Bay Area counties. That table also shows two forecasts of the total employed population for the region: the ABAG forecast (presented above) and the EIR scenario (developed specifically for the Downtown Plan EIR analysis, before the ABAG forecast was available). Table IV.D.20 demonstrates that the conclusions regarding C-3 District workers as a share of the employed population in various parts of the region are the same, no matter which set of regional forecasts is used.

/a/ Includes permanent employment and annual average construction employment. Incorporates changes in employment for office, retail, hotel and other uses.

/b/ Forecasts of employed residents in Bay Area counties from ABAG, Projections '83. ABAG presents forecasts of employed residents for 1985 and 2000. For comparability with the C-3-District forecasts (which use 1984 as the base year), ABAG's projections were pro-rated over the five-year period (1980-1985) to estimate 1984 conditions for the region.

/c/ The C-3-District forecast includes some workers who would live outside the Bay Area. This is a small number and is not shown here.

SOURCE: ABAG, Recht Hausrath & Associates

District workers would be for those living in the East Bay, followed by San Francisco, the Peninsula and the North Bay. The percentages to the right compare the residence patterns forecast for C-3 District workers to ABAG's forecasts of total employed residents throughout the region. C-3 District workers would represent a relatively large share of all employed San Franciscans and relatively smaller proportions of the labor force in other Bay Area counties. Comparing 1984 and 2000, there would not be major changes in the C-3 District percentages of the labor force in each area.

Because regional housing supply assumptions, as well as labor force and employment trends, are the basis for the forecasts, the above observation that the changes over time in the downtown worker percentages of the region's employed population in each area would not be large indicates that downtown workers would not require much larger shares of the region's housing in the future than they do now. In other words, a housing stock consistent with local policies could accommodate both future downtown workers and future workers elsewhere in the region.

As part of total regional employment growth in the future, increases in downtown employment can be viewed as contributing to regional housing demand. A strong regional economy has been and will continue to be a factor supporting a competitive regional housing market with relatively high housing prices and rents. By itself, downtown growth would make only a small difference in the region's housing market outside of San Francisco. If downtown growth did not occur and all other employment growth and housing market factors remained as forecast, it is unlikely that the Bay Area's future housing market would be very different from what would otherwise occur with downtown growth.

All other things being equal, regional employment growth would mean higher prices and rents for housing than would otherwise be the case in the future. It would also mean lower housing services (less acceptable housing conditions at the same, or higher, price) for some of the region's households. How much difference (higher prices/rents or lower services) would result depends on other housing market factors besides employment growth (interest rates, land use policies, other demand factors, etc.). It also depends on the amount of employment growth. Downtown employment growth alone would have less impact than total regional growth.

The housing market impacts of employment growth are not uniform throughout the region. Generally, there would be more effects in nearby communities than in those further from the location of job growth. The main reason is that, all other things being equal, households have a preference for residential locations closer to places of work and can pay more for housing at a closer location because they are not paying the higher transportation costs they would otherwise pay at a more distant place.

Assuming residence patterns similar to those of the nearby C-3 District activities, of the total of 752 employees accommodated by the project in the year 2000, 343 would live in San Francisco, 254 would live in the East Bay, 83 would live on the Peninsula and 72 would live in the North Bay./9/ The proposed project, as part of the future pattern of downtown office development, would contribute to the region-wide housing market impacts described above. The project's individual contribution to these impacts cannot be separately identified.

NOTES - Employment and Housing

/1/ Employment in the project is calculated from the estimates of space by use in the project using employment density factors (gross sq. ft. of space per employee). The employment density factors are those developed in the analysis for the Downtown Plan EIR. (See City and County of San Francisco Downtown Plan (EIR), EE81.3, certified October 13, 1984, Vol. 1, Table IV.C.2, p. IV.C.6 and Table H.3, pp. H.21-H.22.) The office employment density factor used here (268 gross sq. ft. per employee) is for total C-3 District office in the year 2000, including both management/technical office and trade/customer service office business activities. It is different from the density factor of 255 gross sq. ft. of occupied space per employee described in the Downtown Plan EIR (see Vol. 1 p. IV.C.45), however, because it incorporates an average office vacancy rate of 5%. (See Downtown Plan EIR, Vol. 1 note 7, pp. IV.C.55-IV.C.56). This density factor (as well as the other for occupied space) is consistent with the Downtown Plan EIR, forecasts of employment and space, which incorporate an average office vacancy rate of 5%.

The year 2000 density factors are used so the project can be set in the context of cumulative C-3 District development to 2000. Under the Downtown Plan, office employment densities are expected to increase over time as businesses take steps to use space more efficiently when faced with higher rents. This is reflected in the office employment density used in this EIR. (See Downtown Plan EIR, Vol. 1 pp. IV.C.45 and notes 28, 29 and 30, pp. IV.C.60-IV.C.61.)

/2/ Indirect employment projections are based on A 1980 Hybrid Input-Output Model for the San Francisco Bay Region, Association of Bay Area Governments, April 1984. The multipliers used for FIRE sector jobs are averages of the Type I and Type II employment multipliers contained in that model.

/3/ Project estimates of construction employment: Joe Erway, CEDEVCO, telephone conversation, March 8, 1986. A multiplier of 1.75 was used for indirect employment; see note /2/ above.

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/4/ Sue Lee, Mayor's Office of Housing and Economic Development, telephone conversation, February 21, 1986.

/5/ Downtown Plan EIR, Vol. 1, p. IV.D.67.

/6/ San Francisco Department of City Planning, Downtown Plan Environmental Impact Report (EIR) EE81.3, certified October 18, 1984. For a description of the methodology used to forecast residence patterns, see Vol. 2, Appendix I, pp. I.8-I.30. For a description of existing and forecast future residence patterns of C-3 District workers, see Vol. 1, Section IV.D, Residence Patterns and Housing. Also see Vol. 3, Summary of Comments and Responses, pp. C&R-D.82 - C&R-D.83 for a discussion of the role of residence patterns forecasts in analyzing future housing market conditions. These sections are hereby incorporated by reference pursuant to State CEQA Guidelines, Section 15150.

/7/ Association of Bay Area Governments, Projections '83. This report presents forecasts from 1980 to 2000 of population, employment, households, and employed residents for each of the nine Bay Area counties.

/8/ Downtown Plan EIR, Vol. 1, p. IV.D.67.

/9/ In order to ensure consistency with the cumulative transportation analysis and to provide information on regionwide impacts, this section does not use the OAHPP formula for estimating the number of workers who would live in San Francisco. This formula only provides an estimate of office workers living in San Francisco; it does not include factors for estimating workers living in other parts of the region. This formula was applied to the project in the project-specific impact section.

The number of project workers who would live in San Francisco and other areas of the region are estimated using the year 2000 distribution of C-3 District management / technical office workers and retail workers by place of residence shown in the Downtown Plan EIR, Vol. 2, Table I.10. The residential distribution for office workers in the project would be: San Francisco, 44%; East Bay, 35%; Peninsula, 11%; and North Bay, 10%. For retail workers, the distribution would be: San Francisco, 75%; East Bay, 12%; Peninsula, 10%; and North Bay, 3%. The total estimate of workers in the project who would live in each area of the region is the sum of the office and retail estimates in each area.

/10/ Downtown Plan EIR, Vol. 3, pp. C&R-D.83-94. This subsection presents a summary of the discussion as explained in the EIR Summary of Comments and Responses (pp. C&R-D.83 - C&R-D.94 [see Vol. 1, pp. IV.D.77 - IV.D.82 and Vol. 2, pp. I.1 - I.8]), which is hereby incorporated by reference pursuant to State CEQA Guidelines, Section 15150.

H. GROWTH INDUCING IMPACTS

The project (both sites) would contain about 178,100 gross sq. ft. of office space, about 21,600 gross sq. ft. of retail space, about 51,900 gross sq. ft. of parking (139 valet or 69 independently accessible spaces) and about 53,700 gross sq. ft. of residential space (120 units housing 160 people). Employment on the two sites would increase to about

750 people. Occupants of the proposed project are not known, but could include tenants expanding or relocating from other San Francisco locations, tenants relocating from outside San Francisco, and firms new to the Bay Area. The increase in employment at the project site, therefore, would not necessarily represent employment that is new to San Francisco. If the project were fully leased, however, and the office space of the project did not create permanent vacancies in other San Francisco office buildings, total employment in San Francisco would increase by about 720 jobs due to the project. Approximately 1,530 additional jobs would be supported indirectly in the Bay Area through the multiplier effect.

If marketed successfully, the project could have growth-inducing effects in and around North Beach and Chinatown by demonstrating a market for office space in this area. This could thereby encourage similar developments on lots (including smaller lots assembled for development) currently occupied by low-rise or mid-rise buildings containing retail and residential uses. The interim controls and proposed zoning changes for Chinatown and North Beach could limit development of the project vicinity. The demand for office space reflects the trend of growth in service sector and headquarters office activities and employment in San Francisco. Increases in office space and employment would contribute to continued growth of local and regional markets for housing, goods, and services. These growth-inducing effects would be less extensive if the vacancy rate for office space remains relatively high. Should this occur, projected increases in downtown employment would be less and the growth in demand for goods, services and housing would be lower.

It is expected that some downtown workers, including some in the project, would want to live in San Francisco. Employment growth, however, would not be related directly to increases in demand for housing and city services to residents, as some new jobs would be held by individuals who already live and work in the City; who prefer to live in the City but previously either did not work, or worked outside the City; who prefer to live in surrounding communities; or who are unable to afford or locate housing in the City. New workers would also increase the demand for housing in other parts of the Bay Area.

Any net increase in employment would increase the demand for retail goods and services in the area. Increases in employment downtown would also increase demand for business services, to the extent that the expanded space would not be occupied by firms providing

those services. Business service firms with expanded markets would increase demand for existing space and possibly for further new development. No expansion to the municipal infrastructure not already under consideration would be required to accommodate new development and increased employment due to, or induced by, the project.

V. MITIGATION MEASURES PROPOSED TO MINIMIZE POTENTIAL ADVERSE IMPACTS OF THE PROJECT

In the course of project planning and design, measures have been identified that would reduce or eliminate potential environmental impacts of the proposed project. Some of these measures have been, or would be, adopted by the project sponsor or project architects and contractors and thus are proposed; some are under consideration; and some have been rejected. Implementation of some may be the responsibility of public agencies. Measures under consideration or measures rejected by the sponsor may be required by the City Planning Commission as conditions of project approval.

Mitigation measures below preceded by an asterisk (*) are from the Initial Study (see Appendix A, p. A-2).

VISUAL QUALITY

PROPOSED AS PART OF THE PROJECT

- In order to reduce obtrusive light or glare, the project facade would include no highly reflective or tinted glass.

● WIND

The rooftop open space on A-Site would be protected by wind walls. Other wind baffling devices would be included in the project as necessary to reduce winds in the rooftop open space to acceptable levels.

CULTURAL RESOURCES

PROPOSED AS PART OF THE PROJECT

- The sponsor would retain the services of an archaeologist. The Environmental Review Office (ERO) in consultation with the President of the Landmarks Preservation Advisory Board (LPAB) and the archaeologist would determine whether the archaeologist should instruct all excavation and foundation crews on the project site of the potential for discovery of cultural and historic artifacts, and the procedures to be followed if such artifacts are uncovered.

Given the strong possibility of encountering the remains of cultural or historic artifacts within the project site, prior to the commencement of foundation excavations the project sponsor would undertake a program of archaeological testing. This would consist of observation and monitoring by a qualified historical archaeologist of site clearance of at least any materials below existing grade level, and either the placement of a series of mechanical, exploratory borings or other similar on-site testing methods. The archaeologist would supervise the testing at the site to determine the probability of finding cultural and historical remains. At the completion of the archaeological testing program, the archaeologist would submit a written report to the ERO, with a copy to the project sponsor, which describes the findings, assesses their significance and proposes appropriate recommendations for any additional procedures necessary for the mitigation of adverse impacts to cultural resources determined to be significant.

An historical archaeologist would be present during site excavation and would record observations in a permanent log. The ERO would also require cooperation of the project sponsor in assisting such further investigations on site as may be appropriate prior to or during project excavation, even if this results in a delay in excavation activities.

In addition, a program of on-site construction monitoring by a qualified historical archaeologist, designed to allow for the recovery of a representative sample of the cultural materials existing on the site, would be implemented by the project sponsor. This monitoring and recovery program would result in a written report to be submitted to the ERO, with a copy to the project sponsor.

Should cultural or historic artifacts be found following commencement of excavation activities, the archaeologist would assess the significance of the find, and immediately report to the ERO and the President of the LPAB. Upon receiving the advice of the consultants and the LPAB, the ERO would recommend specific mitigation measures, if necessary. Excavation or construction activities following the preconstruction archaeological testing program which might damage the discovered cultural resources would be suspended for a maximum of four weeks (cumulatively for all instances that the ERO has required a delay in excavation or construction) to permit inspection, recommendation and retrieval, if appropriate.

- - Should human remains of Native American origin be encountered during excavation or construction activities, the project sponsor would contact the County Coroner's office, pursuant to the procedures set forth in Section 7050.5 of the Health and Safety Code, to assure preservation and protection of the remains in a respectful manner.

- Following site clearance, an appropriate security program would be implemented to prevent looting. Any discovered cultural artifacts assessed as significant by the archaeologist upon concurrence by the ERO and the President of the LPAB would be placed in a repository designated for such materials or would be displayed on site. Copies of the reports prepared according to these mitigation measures would be sent to the California Archaeological Site Survey Office at Sonoma State University.

TRANSPORTATION, CIRCULATION AND PARKING

MEASURES PROPOSED AS PART OF THE PROJECT

- During the construction period, construction truck movement would be permitted only between 9:00 a.m. and 3:30 p.m. to minimize peak-hour traffic conflicts. The project sponsor and construction contractor would meet with the Traffic Engineering Division of the Bureau of Engineering of the Department of Public Works, the Fire Department, Muni and the Department of City Planning to determine feasible traffic mitigation measures to reduce traffic congestion during construction of this project.
- The project sponsor would, in consultation with the Municipal Railway, install eyebolts or make provisions for direct attachment of eyebolts for Muni trolley wires on the proposed building wherever necessary or agree to waive the right to refuse the attachment of eyebolts to the proposed building if such attachment is done at City expense.
- Should Ordinance 224-81, which requires the sponsor to contribute funds for maintaining and augmenting transportation service in an amount proportional to the demand created by the project, be declared invalid by the courts, the project sponsor has agreed to participate in any subsequent equivalent mitigation measures adopted in lieu thereof that are equitable and legal, which the City adopts to apply to all developments which are similarly situated.

A member of the building management staff would be designated as a "transportation broker" to coordinate measures that are part of a transportation management program, such as: encouraging a flexible time system for employee working hours

(to be developed by project tenants in consultation with the Department of City Planning) to reduce peak period congestion by a planned spreading of employee arrivals and departures; encouraging transit use through the on-site sale of BART, Muni, and other carriers' passes to employees; and encouraging employee carpools and vanpool systems in cooperation with RIDES for Bay Area Commuters by providing a central clearinghouse for carpool and vanpool information.

MEASURES NOT INCLUDED IN THE PROJECT

The project sites are on a block which is on the periphery of the downtown. The Downtown plan discourages new long-term parking spaces in and around downtown. Parking within the project (other than that for residential tenants) could be operated as short-term parking with a fee structure in accordance with that recommended in the Downtown Plan. This measure is under consideration by the project sponsor, and could be required as a condition of project approval.

MEASURES THAT COULD BE IMPLEMENTED BY PUBLIC AGENCIES

- The City could implement the transportation improvements described in the Downtown Plan. Cumulative transportation impacts within San Francisco would be reduced by the improvements and, to the extent that San Francisco can influence transportation improvements recommended in these improvements for areas outside the City, adoption of these improvements will reduce regional cumulative impacts caused by downtown growth.

The City could act to implement the transportation mitigations described in Vol. 1, Section V.E., Mitigation, pages V.E.4-28, in the Downtown Plan EIR. These measures are similar or identical to those in the Downtown Plan and include, in summary: measures to construct and maintain rail rapid transit lines from downtown San Francisco to suburban corridors and major non-downtown centers in San Francisco; measures to fund Vehicle Acquisition Plans for San Francisco and regional transit agencies to expand existing non-rail transit service; provide exclusive transit lanes on City streets and on freeways; reduce incentives to drive by reducing automobile capacities of bridges and highways in certain circumstances and by

discouraging long-term parking; measures to encourage carpools, vanpools, and bicycle use; and measures to improve pedestrian circulation within downtown San Francisco./1/ Some of the Implementing Actions would require approval by decision-makers outside the City and County of San Francisco; many of the measures would require action by City agencies other than the City Planning Commission, such as the San Francisco Public Utilities Commission and/or Board of Supervisors. These measures are system-wide measures that must be implemented by public agencies. Other than project-specific measures such as the relevant transportation mitigation measures described above as part of the project or such as the Transit Impact Development Fee assessment required by San Francisco ordinance 224-81 which contribute indirectly to implementation of these system-wide measures, it is not appropriate to impose mitigation at system-wide levels on individual projects.

- Pacific Gas and Electric Company could coordinate work schedules with other utilities requiring trenching, so that street disruption would take place during off-peak hours as appropriate. This should be done through the San Francisco Committee for Utility Liaison on Construction and Other Projects (CULCOP). In-street utilities should be installed at the same time as the street is opened for construction of the project to minimize street disruption.

NOTE - Transportation, Circulation and Parking

/1/ San Francisco, Department of City Planning, Downtown Plan Environmental Impact Report, EE81.3, certified October 18, 1984, Vol. 1, Section V.E., "Transportation and Circulation," pp. V.E. 4-28. This material is hereby incorporated by reference and is summarized in the above text.

NOISE

PROPOSED AS PART OF THE PROJECT

- *- The project sponsor would require the project contractor to muffle and shield intakes and exhausts and use electric-powered, rather than diesel-powered, construction equipment, as feasible, so that noise would not exceed limits stated in the City's Noise Ordinance (Article 29, San Francisco Administrative Code, 1972).

V. Mitigation Measures

- *- The project sponsor would require the general contractor to construct barriers around the site and stationary equipment such as compressors, which would reduce construction noise by as much as five dBA, and to locate stationary equipment in pit areas or excavated areas, as these areas would serve as noise barriers.
- *- An analysis of noise reduction measurements would be prepared by the project sponsor and recommended noise insulation features would be included as part of the proposed building, as recommended by the Environmental Protection Element of the San Francisco Comprehensive Plan. Such design features could include fixed windows and climate control.

AIR QUALITY

PROPOSED AS PART OF THE PROJECT

- *- The project sponsor would require the contractor to sprinkle demolition sites with water continuously during demolition activity; sprinkle unpaved construction areas with water at least twice per day; cover stockpiles of soil, sand, and other such material; cover trucks hauling debris, soil sand, or other such material; and sweep streets surrounding demolition and construction sites at least once per day to reduce TSP emissions. The project sponsor would require the project contractor to maintain and operate construction equipment so as to minimize exhaust emissions of TSP and other pollutants, by such means as a prohibition on idling motors when equipment is not in use or when trucks are waiting in queues, and implementation of specific maintenance programs (to reduce emissions) for equipment that would be in frequent use for much of a construction period.
- Mitigation measures identified for traffic impacts would also mitigate air quality impacts. Increasing roadway capacity (where feasible and cost effective), reducing vehicular traffic through increased ridesharing (carpool, vanpool, and transit), and implementing flexible and/or staggered work hours would reduce local and regional emissions of all pollutants.

V. Mitigation Measures

- Mitigation measures identified for energy impacts would also mitigate air quality impacts. Reducing natural gas combustion and electricity generation would reduce local and regional emissions of all pollutants.

HOUSING

MEASURE PROPOSED AS PART OF THE PROJECT

- San Francisco Ordinance 358-85 requires the sponsor to participate in the City's Office Affordable Housing Production Program (OAHPP). This program is designed to mitigate the project's contribution to the housing market impacts of San Francisco office development. The OAHPP requires that the project sponsor construct housing or pay a fee to the City to subsidize housing development. Based on the OAHPP formulae in the City's Ordinance, the requirement for this project would be the payment of \$920,082 or the development of 67 housing units. The project sponsor intends to meet this requirement through the 120 subsidized senior housing units providing housing for 160 senior citizens, proposed as part of the project.

MEASURES THAT COULD BE IMPLEMENTED BY PUBLIC AGENCIES

- These measures are system-wide measures that must be implemented by public agencies.

Cumulative housing market impacts of downtown growth would be further reduced by other City efforts (besides OAHPP) to facilitate housing production. The Residence Element of the City's Comprehensive Plan includes strategies and actions for encouraging housing production. These are being implemented by the City Planning Commission and by the City's Redevelopment Agency. In addition, the Mayor's Office of Housing and Economic Development devises and administers programs specifically to preserve and produce affordable housing. Housing production in San Francisco will improve the City's ability to accommodate employment growth without adverse effects on the housing market. Production above the levels assumed in the housing analysis in the Downtown Plan EIR (production averaging 1,000 units added per year) will reduce the housing market impacts described herein.

Other counties and cities through the region could institute policies and programs to increase regional housing production. Such actions would enhance the region's ability to produce housing to accommodate (with less adverse effect), the growth of C-3-District employment as well as other employment growth throughout the region. Measures of these types would require approval by decision-makers outside the City and County of San Francisco and are, thus, beyond the authority of the City Planning Commission and other City bodies.

- Increasing the OAHPP requirements over and above those imposed by San Francisco Ordinance 358-85 and up to a higher level that would still be justified by the analysis providing the economic basis for the OAHPP, would provide further mitigation. It would provide either more funding for subsidizing housing or the production of more housing units. Such additional mitigation could reduce the need for the public agency measures described above. The City Planning Commission has not been delegated the authority to require such a measure. CEQA does not confer on the decision-maker independent authority to mitigate where separate legislative authority is not otherwise available (Pub. Res. Code Section 21004).

GEOLOGY/TOPOGRAPHY

PROPOSED AS PART OF THE PROJECT

- *- A detailed foundation and structural design study would be conducted for the building by a California-licensed structural engineer and a geotechnical consultant. The project sponsor would follow the recommendations of these studies during the final design and construction of the project.
- *- If dewatering were necessary, any groundwater pumped from the site would be retained in a holding tank to allow suspended particles to settle, if this is found necessary by the Industrial Waste Division of the Department of Public Works, to reduce the amount of sediment entering the storm-drain/sewer lines.

V. Mitigation Measures

- *- Should dewatering be necessary, the final soils report would address the potential settlement and subsidence impacts of this dewatering. On the basis of this discussion, the soils report would contain a determination as to whether or not a lateral and settlement survey should be done to monitor any movement or settlement of surrounding buildings and adjacent streets. If a monitoring survey is recommended, the Department of Public Works would require that a Special Inspector (as defined in Article 3 of the Building Code) be retained by the project sponsor to perform this monitoring. Groundwater observation wells would be installed to monitor the level of the water table and other instruments would be used to monitor potential settlement and subsidence. If, in the judgment of the Special Inspector, unacceptable subsidence were to occur during construction, groundwater recharge would be used to halt this settlement. The project sponsor would delay construction if necessary. Costs for the survey and any necessary repairs to service under the street would be borne by the project sponsor.
- During construction, the contractor would sweep streets adjacent to the construction site mechanically or by hand to prevent siltation of storm drains and generation of dust. The contractor would also confine construction equipment, maintenance, and refueling activities to locations where potential petroleum spillage could be contained.

ENERGY

MEASURES PROPOSED AS PART OF THE PROJECT

- *- The project would incorporate energy mitigation such as variable air volume HVAC, 100% outside air economizer, multiple light switching and flow restrictors for plumbing fixtures.
- Final decisions on project energy-saving mitigation measures would be made on the basis of life-cycle costing and compatibility with the overall design; a separate report would be prepared for the Department of City Planning prior to the application for the building permit, which would explain the decisions regarding which energy conservation features would be included in the final design.

- The sponsor would perform a thorough energy audit of the structure's actual energy use after the first year of occupancy and implement all cost-effective alterations to the structure's energy system identified in the audit. Results of the audit would be available to the City.

HAZARDS

PROPOSED AS PART OF THE PROJECT

- *- An evacuation and emergency response plan would be developed by the project sponsor, in consultation with the Mayor's Office of Emergency Services (OES), to insure coordination between the City's emergency planning activities and the project plan and to provide services to building occupants in the event of an emergency. The project emergency plan would be reviewed by the OES and implemented by building management, insofar as feasible, before issuance by the Department of Public Works of final building permits.
- *- To expedite implementation of the City's emergency response plan, the project sponsor would prominently post information for building occupants concerning what to do in the event of a disaster.

VI. SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

This chapter identifies significant impacts that could not be eliminated or reduced to an insignificant level by mitigation measures included as part of the project, as described in Chapter V., Mitigation Measures, p. 150.

No project-specific significant impacts have been identified. Mitigation measures included as part of the project are described in Chapter V., Mitigation Measures, p. 150.

- Cumulative development in Downtown San Francisco would have a significant effect on the environment in that it would generate cumulative traffic increases as well as cumulative passenger loadings on Muni, BART and other regional transit carriers. These cumulative transportation impacts would cause violations to total suspended particulate (TSP) standards in San Francisco with concomitant health effects and reduced visibility. The proposed project would contribute to these cumulative effects.

VII. THE RELATIONSHIP BETWEEN LOCAL SHORT-TERM USES OF MAN'S
ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF
LONG-TERM PRODUCTIVITY

The project would accommodate demand for office and retail space in the area. It would provide housing for 160 senior citizens.

The increased number of vehicle trips associated with the project would incrementally contribute to deterioration of air quality in San Francisco and the Bay Area as a whole.

VIII. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES WHICH WOULD
BE INVOLVED IN THE PROPOSED ACTION SHOULD IT BE IMPLEMENTED

The project would commit the project site to office, retail and residential uses probably for the lifetime of project (50 years). The project could also encourage further commitment of land in the area to similar uses.

IX. ALTERNATIVES TO THE PROPOSED PROJECT

A comparison of gross floor areas of the project with each of the alternative is included in Table 14, p. 172 at the end of this section.

A. NO PROJECT

This alternative would entail no physical change to the site as it now exists. A-Site would remain in its existing vacated condition for the time being; pressure to use the site for temporary parking and/or another development could increase. On B-Site, the Colombo Building would remain in its existing condition. A portion of B-Site would remain vacant.

In general, the environmental characteristics of this alternative would remain as described in the setting section of this report. Present levels of traffic, air pollution, noise, energy consumption, and shadow and visual effects now attributable to the Colombo Building on B-Site would continue as at present. No height reclassification of A-Site would be necessary. There would be no provision of low-cost senior-citizen housing.

This alternative would leave A-Site open for development proposals at a later date. Whether or not these would include low-cost housing cannot be determined. City participation and CDBG funds are essential in the current project to provide this housing. If a similar agreement could not be reached or CDBG funds were no longer available, development of low-cost housing would be rendered more difficult.

The sponsor has rejected this alternative because none of the development objectives would be met. The project sponsor believes that this alternative would underutilize scarce land resources in a valuable area where there is a demand for new office and retail space and a need for low-cost housing.

B. CODE CONFORMING (WITH CU) ALTERNATIVE

The alternative would conform to Planning Code height and bulk requirements with Conditional Use (CU) authorization for height above 65 ft. on B-Site. B-Site is in the 65-D-2 height and bulk district, where heights of up to 200 ft. are permissible with CU authorization. However, in accordance with interim zoning, heights above 40 ft. in Chinatown must receive CU authorization.

This alternative would not require a height reclassification. It would require CU authorization for heights above 40 ft. (both sites), and if the interim zoning were to lapse, would require CU authorization for height above 65 ft. on B-Site.

This alternative would consist of two buildings (see Figure 35, p. 165): the building on B-Site would be set back above the third and seventh levels, rising to a height of about 90 ft. at the top of the eighth level; the building on A-Site would consist of two 65-ft. portions separated by a 40-ft. tall center portion. The Floor Area Ratio (FAR) of the structure on A-Site would be about 4.4:1, the structure on B-Site would have an FAR of about 5.7:1. The overall FAR of the project would be about 5.0:1. This alternative would be exempt from the FAR requirement of 4.8:1 contained in the Chinatown interim controls because it would involve Community Development Block grant funds (as would the project).

Approximately 94,000 gross square feet of office, 21,600 gross square feet of retail and 30,950 gross square feet of residential space (85 units) and 33,650 gross square feet of parking (85 valet spaces) would be included in this alternative.

Because of the reduction in office space of this alternative compared to the project, transportation, air quality, housing demand, and other impacts would be proportionately reduced.

Winds would be unchanged from existing conditions at most of the locations near the Montgomery/Washington intersection and increased along Kearny St. by this alternative. Wind would decrease at ten locations, be unchanged at seven, and increase at four. The winds would range from seven mph to 15 mph, and would exceed 11 mph at four locations. At all of these locations, existing winds already exceed 11 mph. See Appendix B, p. A-39 for a summary of the wind tunnel test results.

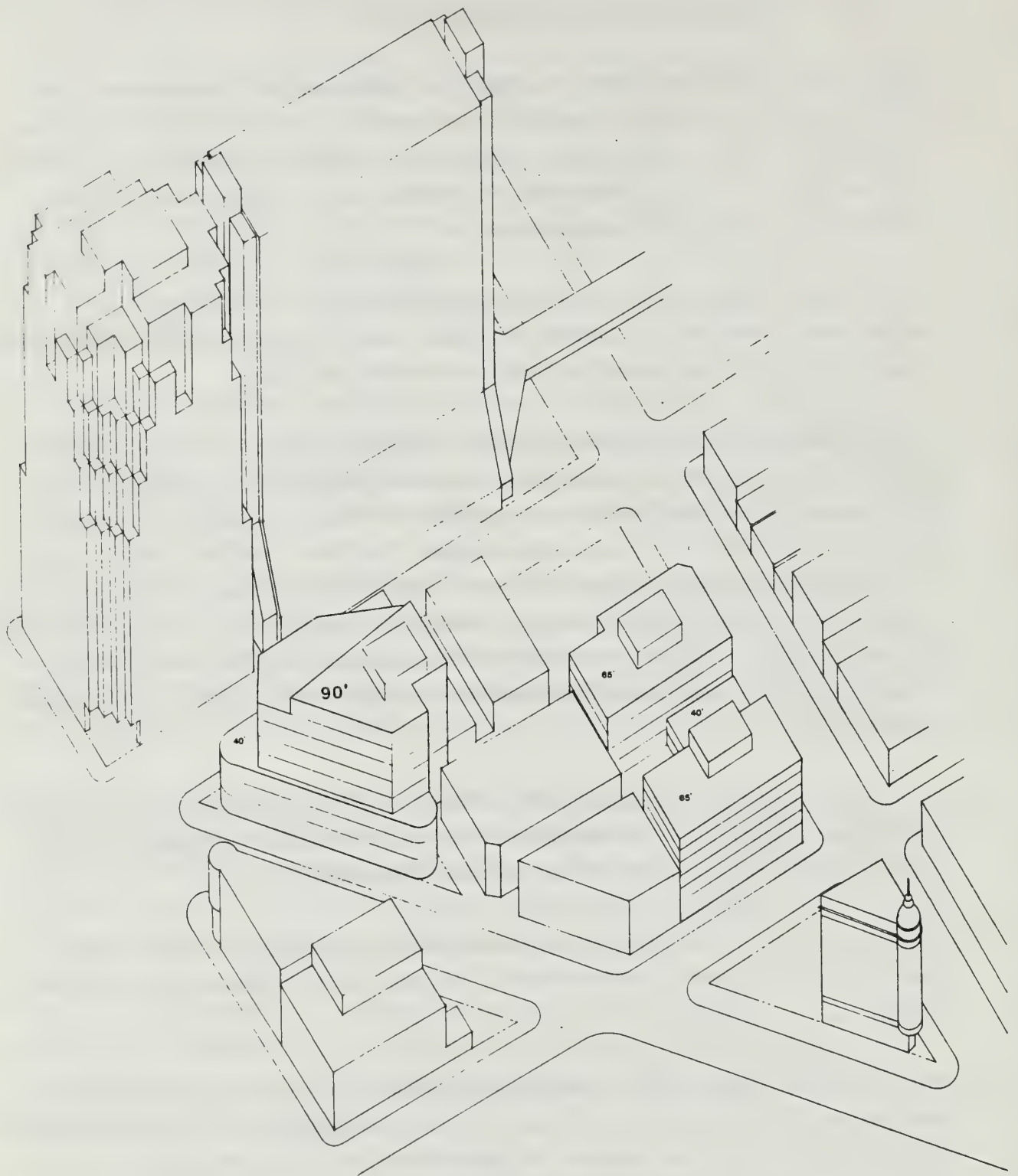


FIGURE 35
CODE CONFORMING
(WITH CU) ALTERNATIVE

SOURCE: HELLER & LEAKE

This alternative would not result in any new shadow on Recreation and Park Department property.

The project sponsor has rejected this alternative, because he considers that it would be an economic underuse of the A-Site, and would not provide as many housing units.

C. PRESERVATION ALTERNATIVE

This alternative would result in the preservation of the Colombo building on B-Site. One additional story, covering 75% of the building footprint, would be added to the Colombo Building. A new eight-story structure would be constructed on the now-vacant Lot 5 west of the Columbo Building. The structure on A-Site would have a 16-story, 200-ft. office tower on the southern half of the site adjacent to an 87-ft-tall, 9-story residential tower. (See Figure 36, p. 167.) As with the project, both portions of the building on A-Site (residential and office) would share a common first floor.

As for the project, a height reclassification for about two thirds of A-Site would be necessary from the existing 65-A, to 65-D-2. In accord with the Chinatown Interim Controls, CU authorization would be necessary for both project buildings to exceed 40 feet in height. Should the Interim Controls lapse, CU authorization would be necessary for project buildings to exceed 65 ft.

Approximately 193,600 gross square feet of office (146,820 A-Site, 46,780 B-Site), about 21,600 gross square feet of retail and about 53,700 gross square feet of residential space (120 units as for the proposed project) and about 51,900 gross square feet of parking (108 spaces on A-Site and 31 spaces on B-Site) would be included in this alternative (as for the project). The FAR for the A-Site structure would be approximately 12:1, and the structure on B-Site would have an FAR of approximately 4.3:1. The overall FAR of the project would be about 8.1:1. Transportation, air quality, housing demand, and other impacts of the alternative would be similar to those of the project, given the similar allocations of office space.

- Under this alternative, the eight-story structure on B-Site would cast new shadow on Portsmouth Square one hour after sunrise on June morning. Alternative C could violate Proposition K, the Park Shadow Ban ordinance which specifies that no new building can cast any new shadows on public open space owned by (or designated for acquisition by) the Recreation and Park Department, unless the Planning Commission and the Recreation and Park Commission find that the shadow is not "significant."

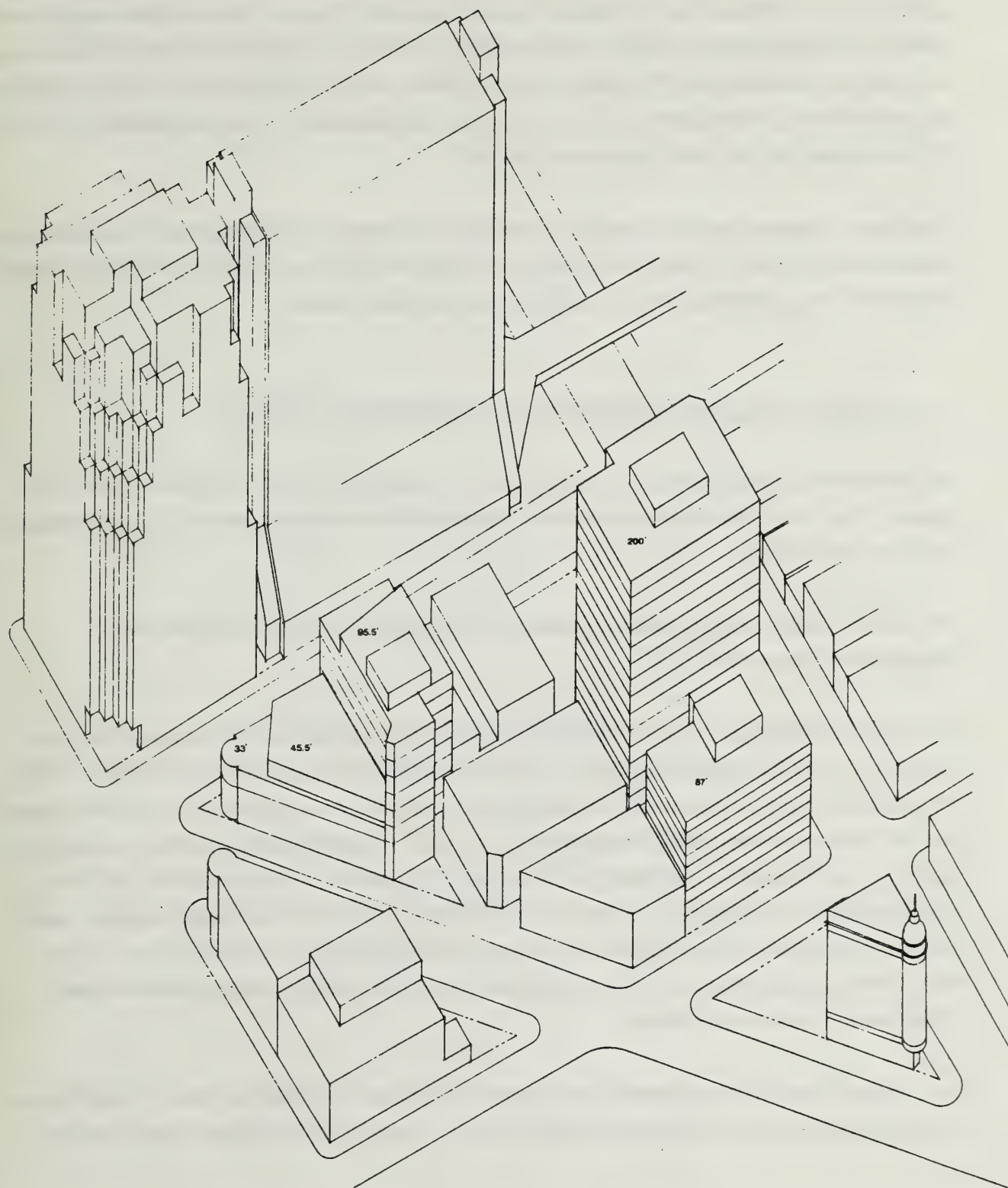


FIGURE 36
PRESERVATION ALTERNATIVE

SOURCE: HELLER & LEAKE

The Preservation Alternative would cause winds to decrease at nine locations, remain the same at five locations, and increase at seven locations. Five of the locations would have winds which would exceed the 11 mph comfort criterion. At three of those five locations, the existing winds exceed 12 mph, but at the fourth and fifth locations, the wind would be increased from six and eight mph to 12 mph by this alternative. See Appendix B, p. A-39 for a summary of the wind tunnel test results.

The project sponsor has rejected this alternative because he considers that it would be an underuse of B-Site. Furthermore, the project sponsor does not consider that the Colombo building is of as high a quality of design as the proposed project.

D. 40-FOOT-TALL CODE CONFORMING ALTERNATIVE (NO CU)

This alternative would consist of two structures, both 40 ft. tall, on A and B-Sites (see Figure 37, p. 169). No height reclassification would be necessary and no CU authorization would be required.

The design would result in no new shadow on Portsmouth Square during the hours regulated by Proposition K.

The Colombo Building would be demolished; the new structure on B-Site would be three stories tall with 27,720 square feet of office and about 9,460 square feet of retail. The structure on A-Site would also be three stories tall and would contain about 34,340 square feet of office and about 12,150 square feet of retail. As proposed under Alternative B, 54 parking spaces would be available on A-Site and 31 spaces would be available on B-Site. There would be no housing units under this alternative. The FAR of both buildings under this alternative would be about 2.9:1. Because of the reduction in office space of this alternative compared to the project, transportation, air quality, housing demand, and other impacts would be reduced.

The project sponsor has rejected this alternative because he considers that it would be an economic underuse of both sites, and none of the development objectives would be met.

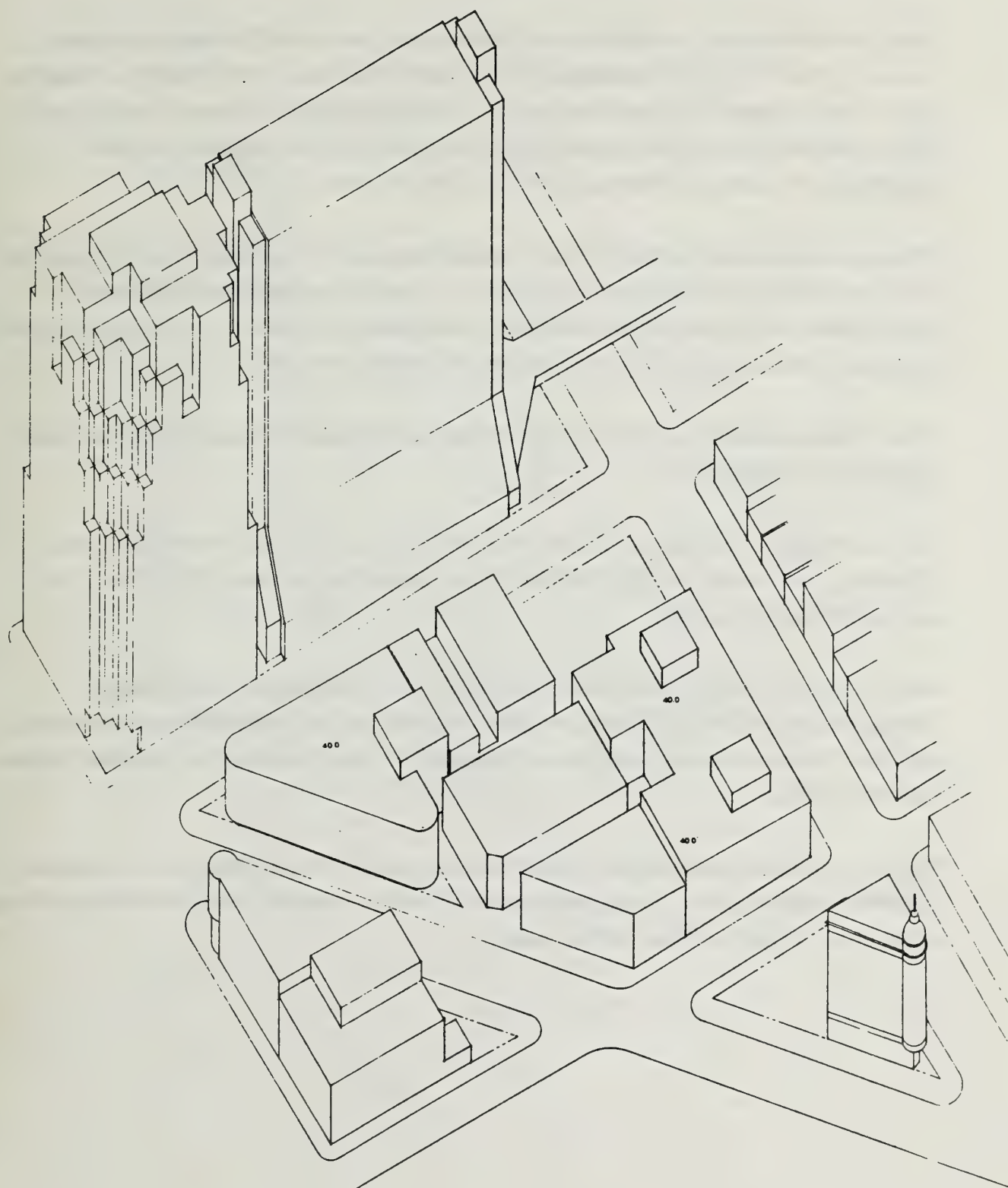


FIGURE 37
CODE CONFORMING 40FT.
ALTERNATIVE

SOURCE: HELLER & LEAKE

E. INCREASED HOUSING ALTERNATIVE

Under this alternative, the building on A-Site would have no office space, but would consist of two 75-ft.-tall residential towers (they would thus not be "high-rise" housing) with a total of about 240 residential units. The building on A-Site would have ground floor retail uses, as with the project. The structure on B-Site would be as under Alternative B - Code Conforming (with CU). (See Figure 37, p. 171)

This alternative would require a height reclassification for a portion of A-Site from the 65-A to the 65-D-2 Height and Bulk District. It would require CU authorization for heights above 40 ft. (both sites), and should the Chinatown Interim Controls expire, this alternative would require CU authorization for height above 65 ft.

This alternative would not result in new shadow on Portsmouth Square during the hours regulated by Proposition K.

This alternative would include a total of 65,700 sq. ft. of office (all on B-Site), about 21,600 sq. ft. of retail, about 107,400 sq. ft. of residential and about 33,650 sq. ft. of parking (85 valet spaces).

Due to the reduction in office space of this alternative, compared to the project, transportation, air quality, housing demand, and other impacts would be proportionately reduced. This alternative would provide housing for 160 more elderly or disabled persons than the project.

The project sponsor has rejected this alternative because he considers that it would be economically infeasible. The sponsor maintains that deletion of office space from A-Site would result in abandonment of the project.

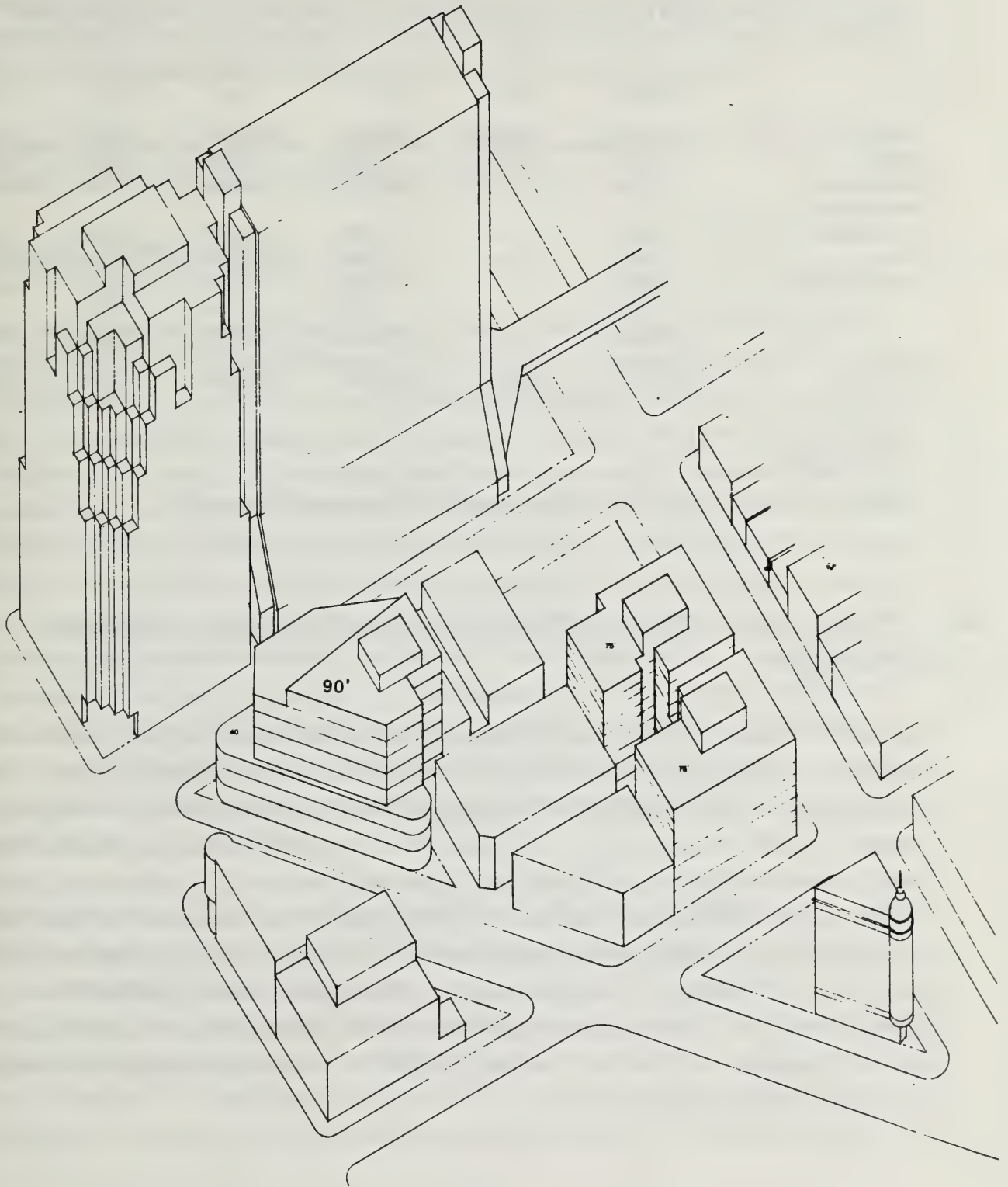


FIGURE 38

SOURCE: HELLER AND LEAKE

INCREASED-HOUSING ALTERNATIVE

TABLE 14: COMPARISON OF FLOOR AREAS OF PROJECT AND ALTERNATIVES

	<u>Project</u>	<u>A</u>	<u>B</u>	<u>C</u>	<u>D</u>	<u>E</u>
Office	178,100	5,800 /a/	94,000	193,600	62,060	65,700
Retail	21,600	5,800 /a/	21,600	21,600	21,600	21,600
Residential	53,700		30,950	53,700	--	107,400
Mechanical/ Storage	8,900	--	5,000	8,900	4,000	6,000
Lobby	5,500	--	5,500	5,500	--	5,500
Parking (Valet)	51,900	--	33,650	51,900	33,650	33,650
	(139 <u>spaces</u>)	<u> </u>	(85 <u>spaces</u>)	(139 <u>spaces</u>)	(85 <u>spaces</u>)	(85 <u>spaces</u>)
TOTAL	319,700	11,600	190,700	335,200	121,310	239,850

/a/ Existing.

SOURCE: Heller & Leake, and Environmental Science Associates, Inc.

● F. CHINATOWN RESOURCE CENTER AND ASIAN NEIGHBORHOOD DESIGN ALTERNATIVE

Alternative F would consist of three buildings, two of which would share a common base on A-Site. The building on B-Site would be the same as with the proposed project. The configuration of the building on A-Site would be similar to Alternative E. A-Site would consist of two 85 ft.-tall towers. The tower at the corner of Kearny and Jackson Streets, would contain 57,300 sq. ft. of office space over retail space and the other tower, directly behind the office tower, would contain 53,700 sq. ft. of residential space (120 units as for with project). The residential structure would also contain retail space, community and lobby space. Alternative F would have about 20% less office space than the DEIR project; 18,600 sq. ft. of retail space, 5,500 sq. ft. lobby and 6,000 sq. ft. of mechanical space as compared to 21,600 sq. ft. retail, 5,500 sq. ft. lobby and 8,900 sq. ft. mechanical as with the proposed project.

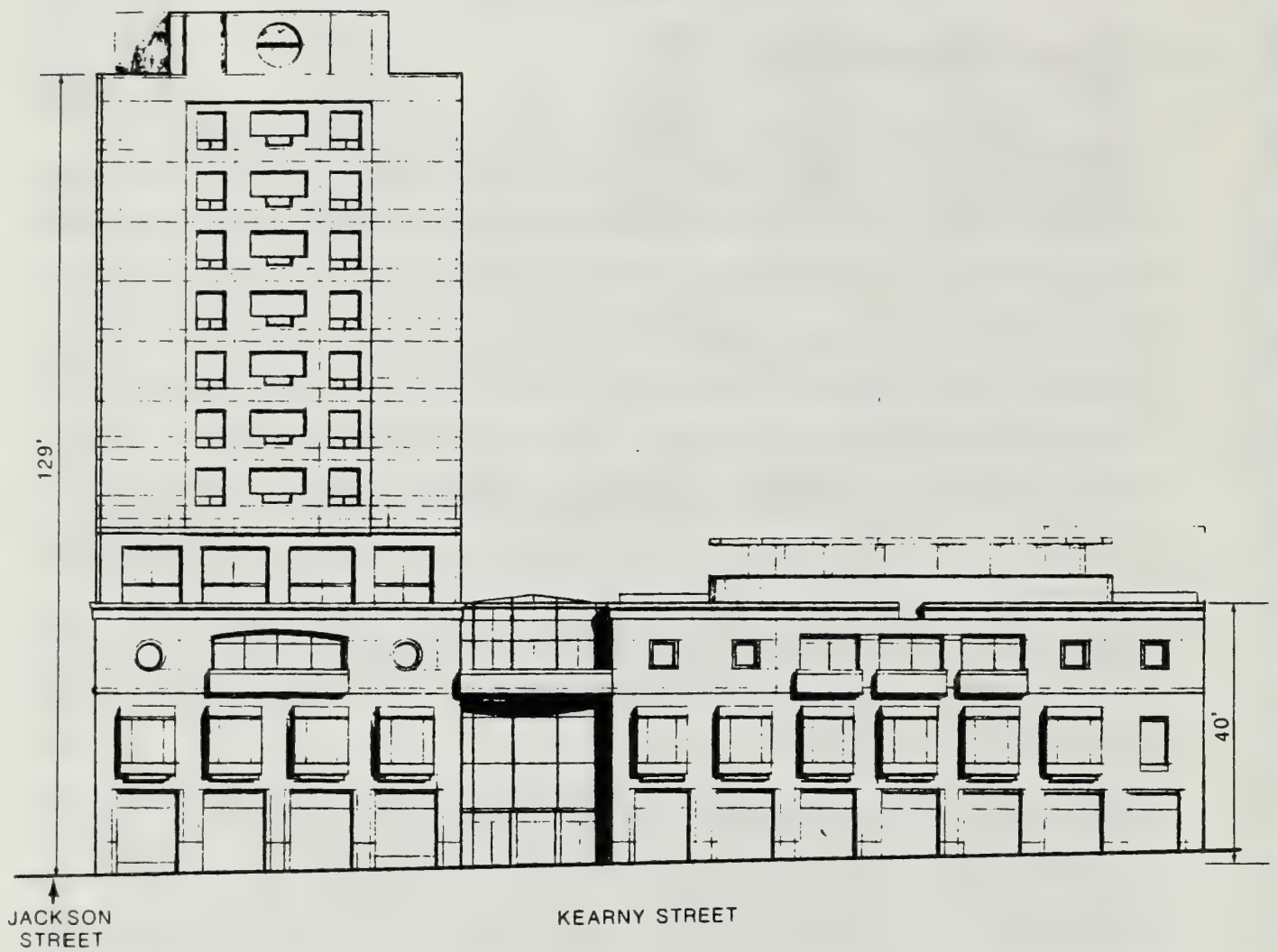
Because of the reduction in office space of this alternative compared to the project, transportation, air quality, housing demand, and other impacts would be proportionately reduced. Wind impacts would be similar to those of the proposed project.

The project sponsor has rejected this alternative as he considers that it would be less aesthetically attractive than the project or Alternative G.

● **G. REDUCED OFFICE SPACE**

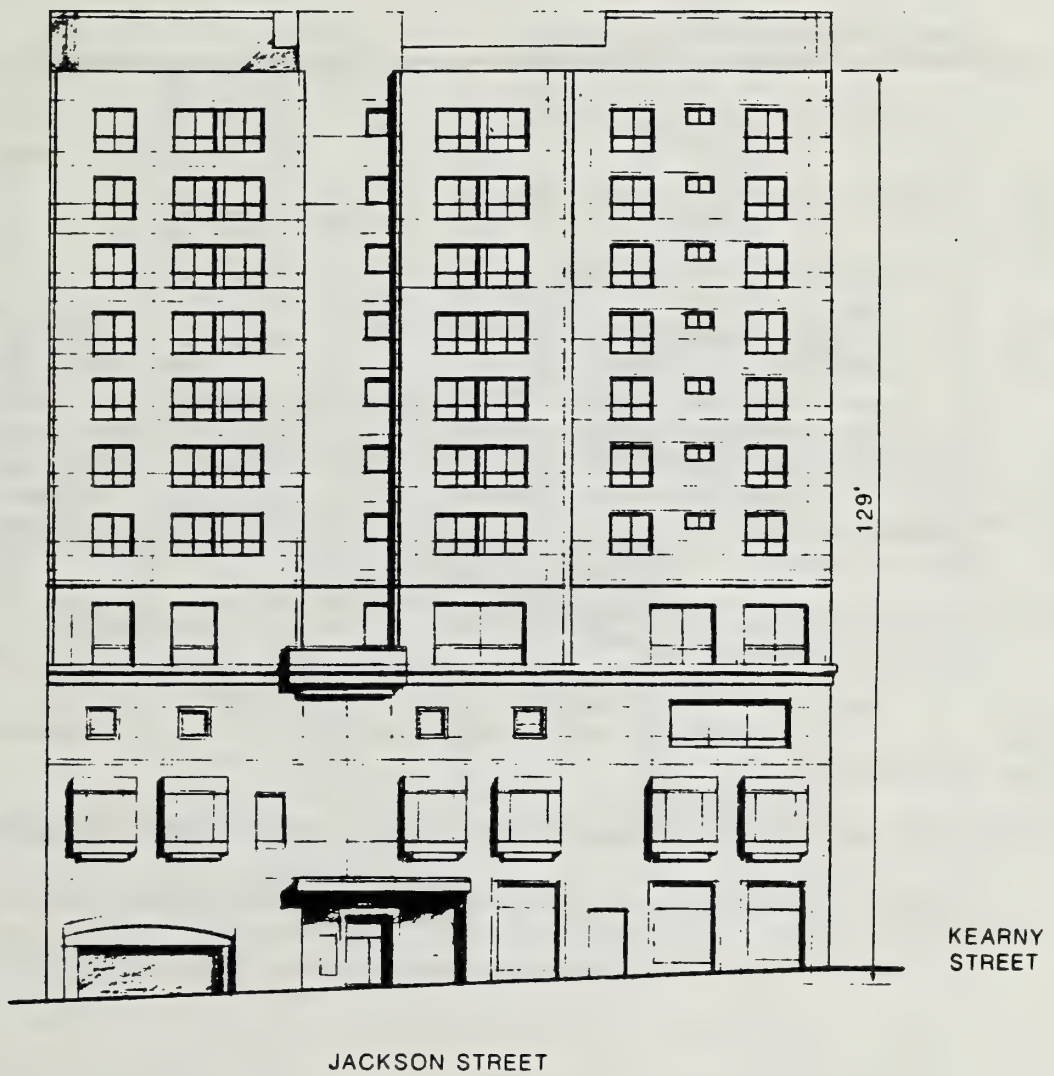
Under this alternative the building on B-Site would be the same as with the proposed project (81,300 sq. ft of office, 9,500 sq. ft. of retail and 31 parking spaces). The building on A-Site would be 11-stories tall (northern portion) along Jackson Street and would step down to three-stories tall (southern portion) south of Jackson Street along Kearny Street (see Figures 39, 40 and 41). The building would have three levels of basement parking accessible from Jackson Street. The first two floors of the structure would have retail space with restaurant space on the third floor (see Figure 42, Ground Floor Plan). About half of the first basement level would have restaurants accessible by escalator from the atrium courtyard (see Figure 43). The retail/restaurant levels would be common to both the northern and southern portions of the building. An atrium courtyard would be located in the center of the southern portion of the building with a rooftop garden and terrace atop of the third floor. The first basement levels would be accessible directly from Jackson Street. Escalators would connect the first three floors of the structure. Seven floors of residential units and a community services floor (fourth) would be located in the northern portion of the building.

Under this alternative, A-Site would include 126 residential units (51,900 sq. ft.), a total of 43,300 sq ft. of commercial space (19,300 sq. ft. retail and 24,000 sq. ft. restaurant space) and 155 self-service parking spaces; as compared to 120 units, 96,800 sq. ft. of office 12,100 sq. ft. of retail and 108 valet parking spaces with the project. Residential space would include 35 double units at 325 sq. ft. each and 91 single units at 250-300 sq. ft. each. Alternative G would also include 6,600 sq. ft. of community space and one loading dock. The height of the residential or northern portion of the building would be



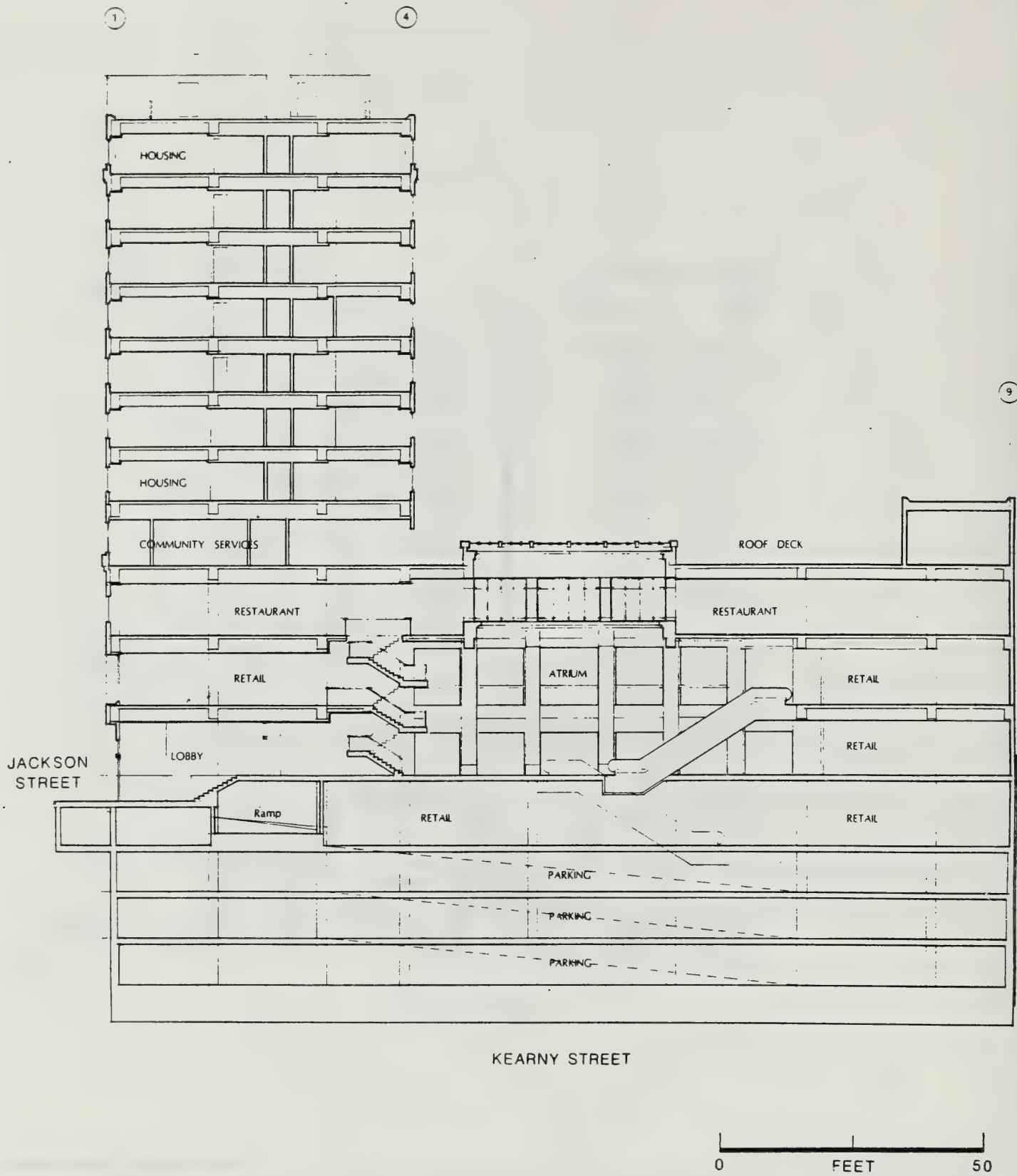
SOURCE: Lun Chan Associates

● FIGURE 39
ALTERNATIVE G, A-SITE
KEARNY STREET ELEVATION



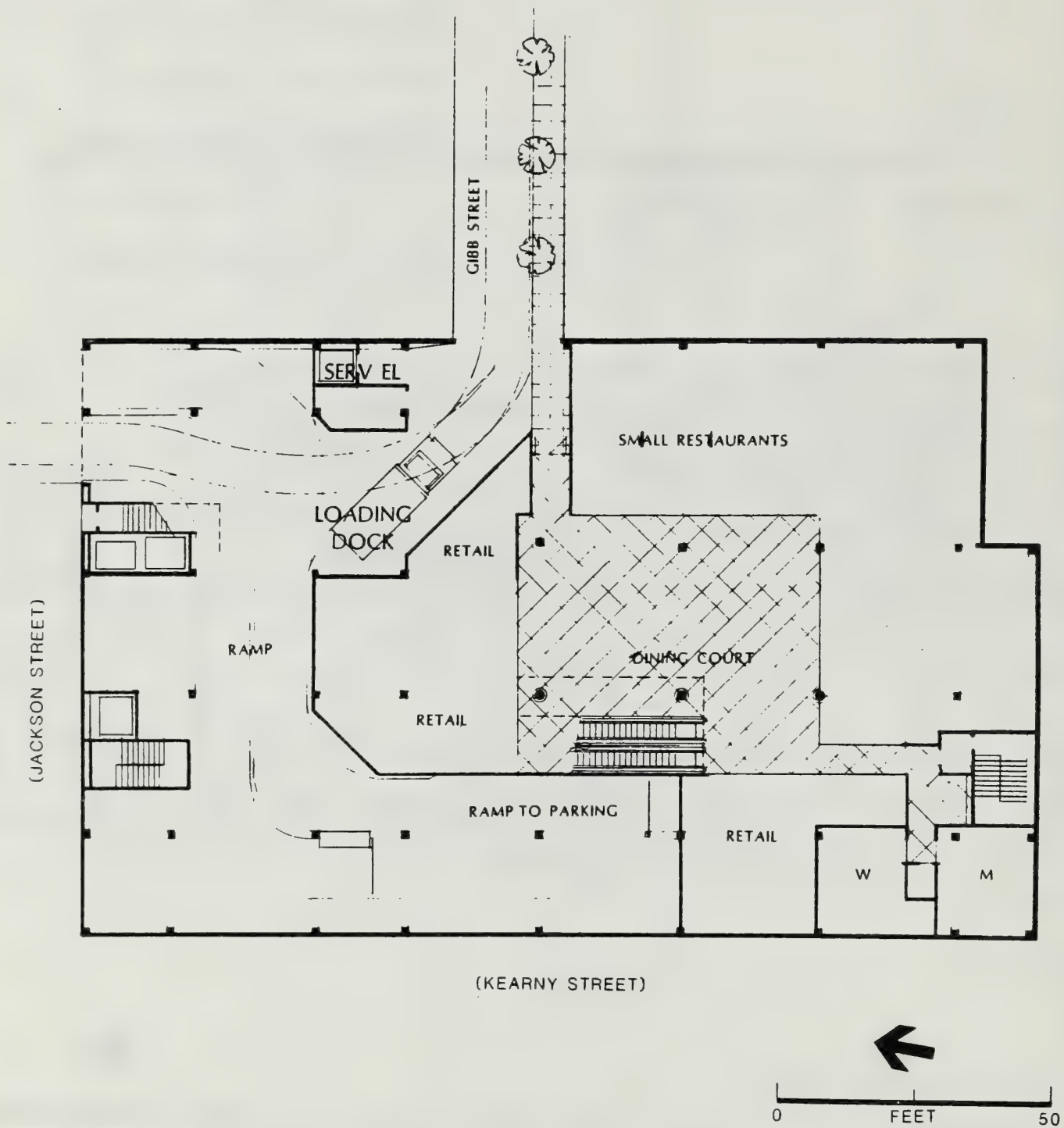
SOURCE: Lun Chan Associates

● FIGURE 40
ALTERNATIVE G, A-SITE
JACKSON STREET ELEVATION



● FIGURE 41
ALTERNATIVE G, A-SITE
BUILDING SECTION

SOURCE: Lun Chan Associates



● FIGURE 43
 ALTERNATIVE G, A-SITE
 FIRST BASEMENT LEVEL PLAN

SOURCE: Lun Chan Associates

IX. Alternatives

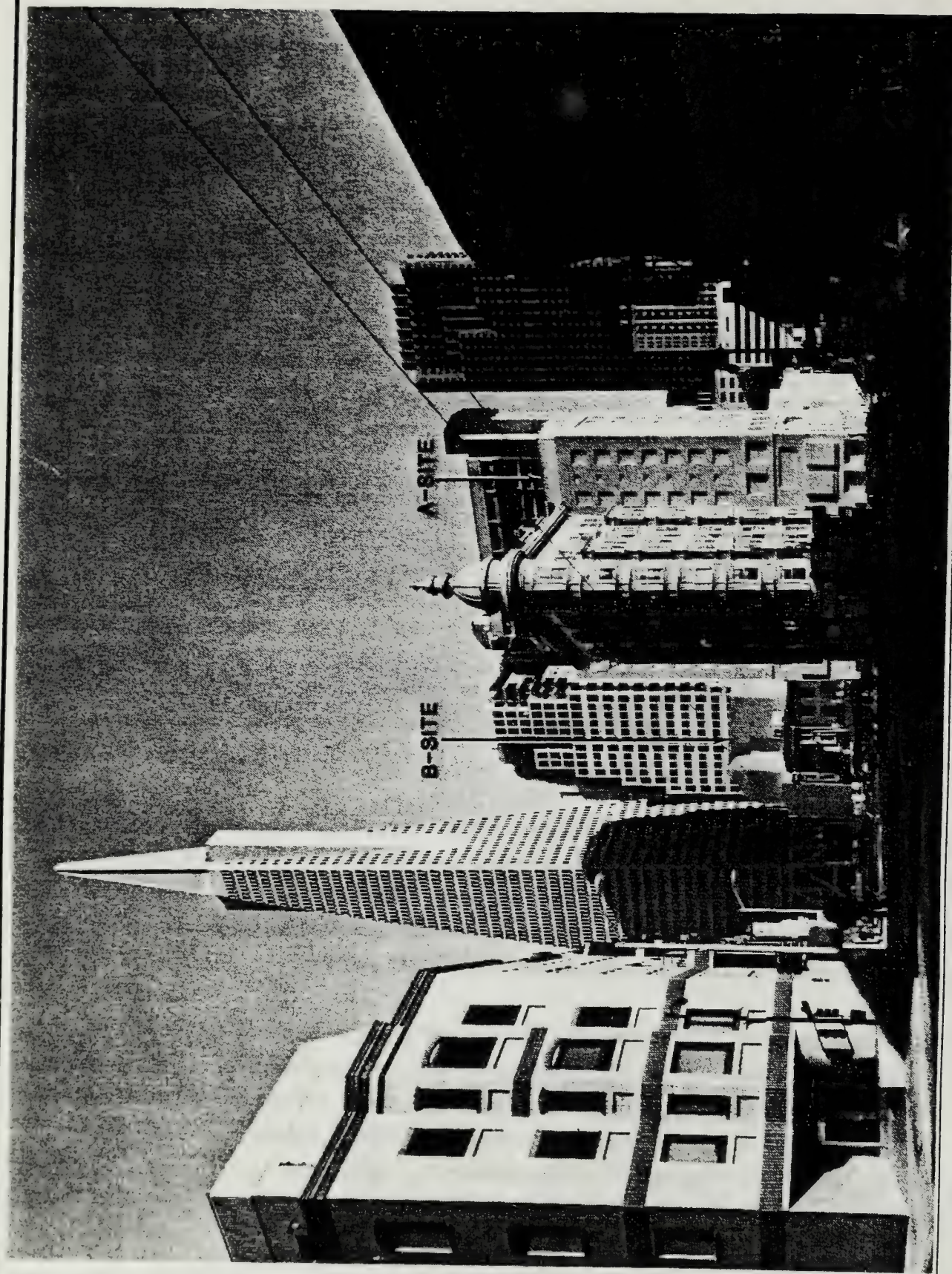
about 130 ft. with a 10 ft.-tall mechanical penthouse atop; the southern portion would be about 45 ft.-tall not including the mechanical penthouse. Neither portion of the building would include setbacks.

The Chinatown Permanent Zoning Controls (approved by the Planning Commission in February 19, 1987) require 48 sq. ft. of open space per dwelling unit. The City Planning Code specifies that for dwelling units specifically designed for and occupied by senior citizens or physically handicapped persons the minimum amount of open space required is reduced to one-half the amount otherwise required. Under Chinatown Permanent Controls, this alternative would be required to provide about 4,022 sq. ft. of common usable of open space for residential uses. Commercial open space requirements are one sq. ft. for every 50 sq. ft. (gross floor area) of commercial space; Alternative G would be required to provide 2,682 sq. ft. of open space for commercial uses. Open space requirements would be met with the rooftop garden and, terrace (9,400 sq. ft.). The rooftop garden and terrace would also meet the projects site coverage requirement (Section 134.1, Permanent Controls) that new structures provide 25% of the site in non-covered area on residential levels; rooftop terraces and balconies are considered non-covered.

Alternative G would require the same approvals to those necessary for the project and listed on pp. 213 to 215, with the exception of the variance from Section 134.1 Site Coverage requirements.

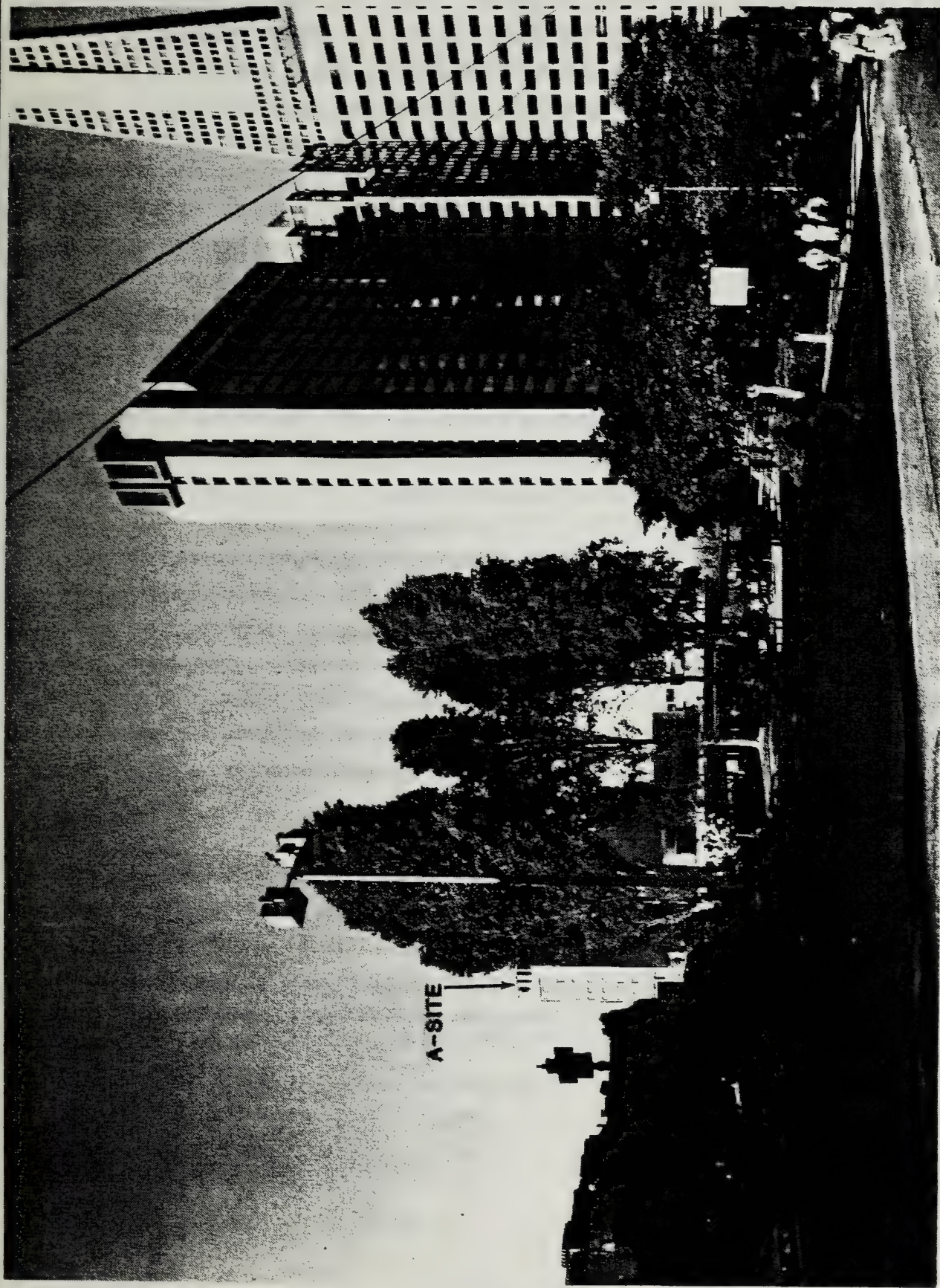
The impacts for B-Site of this alternative would be about the same as, or less than, those with the proposed project. The northern portion of the A-Site structure would be about 55 ft. taller than the proposed project at Jackson and Kearny Streets and about 150 ft. shorter at the southern portion along Kearny Street, not including mechanical penthouses. (Photomontages of Alternative G are shown in Figures 44 and 45.)

Neither the northern or southern portion of the structure on A-Site would include any setbacks; due to its overall reduced heights, it would be less prominent than the project in mid- and long-range views from the north and west. From Telegraph and Nob Hills, this alternative would be visible as would the proposed project. However, it would be less prominent. The southern portion of the building on A-Site under this alternative would be similar to the existing streetwall height along Kearny Street.



● FIGURE 44
ALTERNATIVE G: PHOTOMONTAGE OF A- AND B-SITES
FROM COLUMBUS/KEARNY INTERSECTION

SOURCE: Douglas Symes



● FIGURE 45
ALTERNATIVE G: PHOTOMONTAGE OF A-SITE
FROM SOUTHWEST CORNER OF PORTSMOUTH SQUARE

SOURCE: Douglas Symes

Shadow effects from B-Site would be the same as with the project. The configuration of shadows from A-Site would be different from the project because the taller portion of the structure would be at the corner of Kearny and Jackson Streets whereas for the project, the taller portion of the structure would be at the southern portion of the site. Generally shadows from A-Site under Alternative G would be shorter than with the project, because of the reduced overall height. Alternative G would result in incrementally more shadow on the street and sidewalk on Kearny between Jackson and Columbus, Columbus between Jackson and Kearny and Jackson for approximately one-half block from the site in both directions. It would result in less shadow on Kearny between Washington and Jackson, Columbus between Washington and Jackson and Gibb Street. Shadow diagrams for A-Site under Alternative G, at 10 a.m., noon, and 3 p.m. during March, June and September are on file and available for public review at the Office of Environmental Review, 450 McAllister, San Francisco. (Shadows from A-Site under this alternative in December would differ from project shadows but would not result in additional shadows on streets and sidewalks compared to the project. All additional shadow would fall on rooftops.)

Using the Downtown Plan EIR analysis this alternative would generate about 9,270 net new daily pte; about 44% more than with the project. This alternative would generate more trips than the project because of its increased amount of retail space. Using the Downtown Plan EIR analysis peak period pte with this alternative would be about 975 with 590 occurring during the peak hour, representing about 11% more than with the project. Impacts on traffic and transit would be proportionately more. With this alternative, using the Downtown Plan EIR analysis Levels of Service at the six intersections analyzed (see p. 121 of the EIR) would be the same as with the project.

Transportation impacts of Alternative G have been analyzed using modal split data from the Transportation Impact Analysis for the Proposed Chinatown Rezoning Plan (see pp. 69 to 72 of this document for a discussion of this analysis). Using the Chinatown analysis, Alternative G would generate 6,035 net new daily pte with 840 occurring during the peak period and 520 during the peak hour. Table 13A below shows peak period and peak hour trips by mode from Alternative G.

IX. Alternatives

Using the Chinatown modal splits, daily trips would be less than one percent more than the numbers generated by the project using the same analysis, and peak hour trips would be about 16% and 24% less than with the project. Travel from Alternative G would be distributed more uniformly throughout the day than with the project because of the increased retail space. Impacts on traffic and transit would be proportionately less than the project analyzed with the Chinatown modal splits.

Levels of service at the six intersections analyzed have been analyzed here with Alternative G using the method used in the Transportation Impact Analysis for the Proposed Chinatown Rezoning Plan. Table 13B shows the effects of Alternative G. The levels of service at these intersections would be the same as with the project using this method.

TABLE 13A: PROJECTED TRAVEL DEMAND BY MODE FROM ALTERNATIVE G USING "CHINATOWN METHODOLOGY" (pte/a/)

<u>Travel Mode</u>	<u>P.M. Peak Period/b/</u>	<u>P.M. Peak Hour/b/</u>
Drive Alone	190	120
Car/Vanpool	175	100
Muni	270	165
BART	20	15
AC Transit	5	5
San Trans	10	5
SPRR (Caltrain)	5	5
GGT Bus	-	-
Ferry	-	-
Walk Only/c/	165	-
Other	-	105
TOTALS (rounded)	840	520

/a/ Person trip ends

/b/ The peak hour occurs during the two-hour peak period of 4:00 to 6:00 p.m.

/c/ These trips are solely walking trips and are not made in combination with any other form of transportation. Destinations are to other places than just home.

SOURCE: Environmental Science Associates

TABLE 13B: PROJECTED PEAK-HOUR INTERSECTION VOLUME-TO-CAPACITY RATIOS (V/C) AND LEVELS OF SERVICE (LOS) FOR ALTERNATIVE G USING "CHINATOWN METHODOLOGY" /a/

<u>Intersection</u>	<u>Existing</u>		<u>Existing+Alternative G</u>	
	<u>V/C</u>	<u>LOS</u>	<u>V/C</u>	<u>LOS</u>
Columbus & Montgomery	0.75	C	0.76	C
Columbus & Jackson	0.67	B	0.71	C
Kearny & Jackson	0.62	B	0.63	B
Broadway & Sansome	-	C	0.81	D/b/
Clay & Battery	-	C	0.75	C/b/
Kearny & Washington	0.46	A	0.50	A

/a/ Level of Service descriptions and relationship to V/C ratios are shown in Table D-3, p. A-53 of Appendix D.

/b/ These intersections are analyzed with the Chinatown Modal Splits but not with the Chinatown LOS Method.

SOURCE: Environmental Science Associates, Inc., Transportation Impact Analysis for the Proposed Chinatown Rezoning Plan

This alternative would create a net new demand for about 95 long term spaces and net new demand for 40 short term spaces for a total daily demand of 135 equivalent daily spaces. This alternative would provide 186 cars, a surplus of 51 spaces as compared to the deficit of 40 spaces that the project would create.

This alternative would generate a demand for an average of two loading spaces per hour with a peak hourly demand for 2.5 loading spaces. One loading space would be required on A-Site and none on B-Site as with the project. One loading dock would be provided on the ground floor of A-Site with access from Jackson Street. Trucks would circulate through the ground floor and exit on Gibb Alley and Columbus Avenue (see Figure 43). A right-turn only would be permitted at the truck exit from Gibb Alley to Columbus Avenue. Site B would generate a demand for one loading space per hour. As with the project, the sponsor would request a loading zone curb designation for Washington St. from the Department of Public Works.

IX. Alternatives

Air quality, energy and noise effects associated with on-site uses would be about the same as with the project. Cultural resource effects associated with construction of this alternative could be greater than with the project as this alternative would include four basement levels on A-Site compared with two for the project.

Alternative G is the project sponsor's preferred alternative as it would meet his objectives for the site and respond to concerns raised about the project.

● X. SUMMARY OF COMMENTS AND RESPONSES

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I. INTRODUCTION

This document contains summaries of the public comments received on the Draft Environmental Impact Report (DEIR) prepared for the proposed Pan Magna Plaza project, and responses to those comments. Also included are staff-initiated text changes and errata.

All substantive comments made at the Draft EIR public hearing before the City Planning Commission, May 1, 1986, and all written comments received during the Draft EIR public review period from March 14, 1986 to May 7, 1986, are presented herein by direct quotation, edited to delete repetition and nonsubstantive material only.

Comments and responses are grouped by subject matter and are arranged by topics corresponding to the Table of Contents in the DEIR. Each group of comments is followed by its set of responses; the order of the responses under each topic follows the order of the comments. As the subject matter of one topic may overlap that of other topics, the reader must occasionally refer to more than one group of Comments and Responses to review all information on a given subject. Where this occurs, cross references are provided.

Some comments do not pertain to physical environmental issues, but responses are included to provide additional information for use by decision-makers.

These comments and responses will be incorporated into the Final EIR as a new chapter. Text changes resulting from comments and responses will also be incorporated into the Final EIR, as indicated in the responses.

II. LIST OF PERSONS COMMENTING

Georgia Brittan, San Franciscans for Reasonable Growth (SFRG)
(written comments, April 24, 1986)

Don Chan, Community Social Service Worker
(DEIR public hearing comments, May 1, 1986 and written comments, April 11, 1986)

Sue Chin
(DEIR public hearing comments, May 1, 1986)

Chinatown Resource Center and Asian Neighborhood Design (CRC & AND)
(written comments, no date, submitted May 1, 1986)

Howard Ellman, Ellman Burke and Cassidy, representing Telegraph Hill Dwellers,
Montgomery-Washington Tower Association and Crow-Spieker Companies
(DEIR public hearing comments, May 1, 1986, and written comments, April 30, 1986)

Stanley Fong, Adjacent Property Owner
(written comments, April 28, 1986)

Dick Grosboll, San Francisco Tomorrow (SFT)
(written comments, May 1, 1986)

Sue Hestor, San Franciscans for Reasonable Growth (SFRG)
(DEIR public hearing comments, May 1, 1986)

Lisa Huggins
(DEIR public hearing comments, May 1, 1986)

Cynthia Joe, Chinatown Resource Center (CRC)
(DEIR public hearing comments, May 1, 1986)

Tom Jones, Asian Neighborhood Design (AND)
(DEIR public hearing comments, May 1, 1986)

Marc Kasky
(DEIR public hearing comments, May 1, 1986)

Joe Kaufman
(DEIR public hearing comments, May 1, 1986)

John A. Knox, Jr.
(written comments, May 6, 1986)

Edwin Lee, Lorraine A. Lowe, Alton Chin, Chinatown Coalition for Better Housing (CCBH)
(written comments, April 30, 1986)

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Deborah Lim
(DEIR public hearing comments, May 1, 1986)

Michael Louie, Chinatown Transportation Research and Improvement Project (TRIP)
(DEIR public hearing comments, May 1, 1986, and written comments, April 30, 1986)

Rolland Lowe, M.D., International Hotel Block Citizen's Advisory Committee (CAC)
(written comments, April 23, 1986, and May 1, 1986)

Neil Malloch and Herbert J. Konkoff, M.D., California Heritage Council (CHC)
(written comments, May 7, 1986)

Jonathan H. Malone, Landmarks Preservation Advisory Board (LPAB)
(written comments, April 7, 1986)

Annette Ospital, Native American Heritage Commission (NAHC)
(written comments, April 4, 1986)

Bradford Paul, North of Market Planning Coalition (NOMPC)
(DEIR public hearing comments, May 1, 1986, and written comments, May 1, 1986)

Toby Rosenblatt, President, San Francisco City Planning Commission
(DEIR public hearing comments, May 1, 1986, and written comments, May 1, 1986)

Wallace Rothbart, Caltrans
(written comments, April 16, 1986)

Mark Ryser, Foundation for San Francisco's Architectural Heritage (Heritage)
(written comments, May 1, 1986)

Robert Sockolov, Adjacent Property Owner
(written comments, March 22, 1986)

Jane Winslow, Telegraph Hill Dwellers (THD)
(DEIR public hearing comments, May 1, 1986)

K. L. (Dan) Wong, San Francisco Municipal Railway, Planning Division (MUNI)
(written comments, March 20, 1986)

III. COMMENTS AND RESPONSES

The Draft EIR on the project was published on March 14, 1986. The public comment period extended through May 7, 1986. Between May 1986 and early 1987, as a result of continued negotiation between the project sponsor, the Mayor's office and other City agencies, the Citizens Advisory Committee, and the other public groups, changes to the project were proposed. A new alternative, "Alternative G" is included in this document. The alternative and its impacts are described on pp. 370 to 381. Throughout this Comments and Responses document, and in the Final EIR, the project as originally proposed and analyzed will be referred to as "the project," the sponsor's preferred alternative will be referred to as "Alternative G." Where appropriate, comments requesting information about the project will receive responses containing information about both the project as originally proposed and the sponsor's preferred alternative.

PROJECT DESCRIPTION

HEIGHT AND BULK

Comments

"Why are 30 [feet] of mechanicals necessary for the office portion of building A? Building B needs only 6. [feet]

"On page 17 of the DEIR, office tower on A Site is 12 floors. On page 77, it is 14 stories. What is the proper figure?" (Chinatown Resource Center)

Response

The mechanical level of the office tower on A-Site is actually 10 ft. in height. The additional 20 ft. making up the 30 ft. of building height above the occupied floors consists of the dome (see Figure 4), which is a decorative architectural feature and which may also contain mechanical equipment.

X. Summary of Comments and Responses

The discussion on p. 17 states that the office building on A-Site has 12 office floors, in addition to retail and mechanical levels, totalling 14 stories in all. The two references are not contradictory and are correct as stated.

Alternative G, the project sponsor's preferred plan has a different building design for A-Site. See pp. 370 to 381.

Comment

"The DEIR contains repeated references to building setbacks and a cornice line which complements surrounding scale. For example, 'Setbacks would reduce apparent height.' (Page 6.) Illustrations show no setbacks. Explain." (Chinatown Resource Center)

Response

On p. 20, first full paragraph, the EIR states, "The eight-story residential tower would contain no setbacks. The office tower would include chamfering of building corners." Chamfering is shown in Figure 7. Figures 9, 10 and 11 of the EIR illustrate setbacks on the building proposed for B-site. This building would be setback above the fourth and seventh floors. Figure 10, p. 29, shows three cornices for this building: at the third, fourth and seventh levels.

See pp. 370 to 381 for a description of Alternative G, the project sponsor's preferred plan, which has a different building design for A-Site.

Comment

"Please include diagrams showing bulk exceptions to be requested." (Toby Rosenblatt, President, City Planning Commission)

Response

Bulk Exceptions

Requested bulk exceptions (for the DEIR project), taken from Table 1, p. 18 of the EIR, are for 175 ft. (110 ft. allowed) in length and 207 ft. (125 ft. allowed) in diagonal

on A-Site, and 179 ft. (110 ft. allowed) in length and 195 ft. (140 ft. allowed) in diagonal on B-site (see Figure C&R 1, p. 182).

Under Alternative G, the project sponsor's preferred plan, the A-Site building would have a maximum length of 175 ft. and maximum diagonal of 208 ft. above a height of 40 ft., and would thus require exception to bulk requirements. Bulk exceptions as with the project would be requested for the B-Site building.

Sunlight Access Setbacks

In order to protect sunlight on Chinatown sidewalks, the Chinatown Permanent Controls require specified setbacks for certain streets (including Kearny and Washington Streets) at specified heights (see pp. 213 to 214). Neither the project nor Alternative G would include these setbacks (see Figure C&R 1, p. 182). The sponsor is requesting an exception from this requirement as part of the Conditional Use process.

HOUSING

Comment

"Do units at proposed sizes - i.e., 360 square feet for doubles -- meet FHA minimum property standards? Can CDBG funds be used for units which do not?" (Chinatown Resource Center)

Response

The Federal Housing Administration has no minimum unit sizes. There is a maximum size standard of 415 sq. ft. for studio units. The FHA uses a "furniture placement test" to determine if a unit is "liveable".^{1/} Figure 8, p. 27 of the EIR shows typical furniture floor plans for single and double units. The Community Development Block Grant (CDBG) program of the FHA has no regulation restricting the use of CDBG funds based on the size of dwelling units.^{2/}

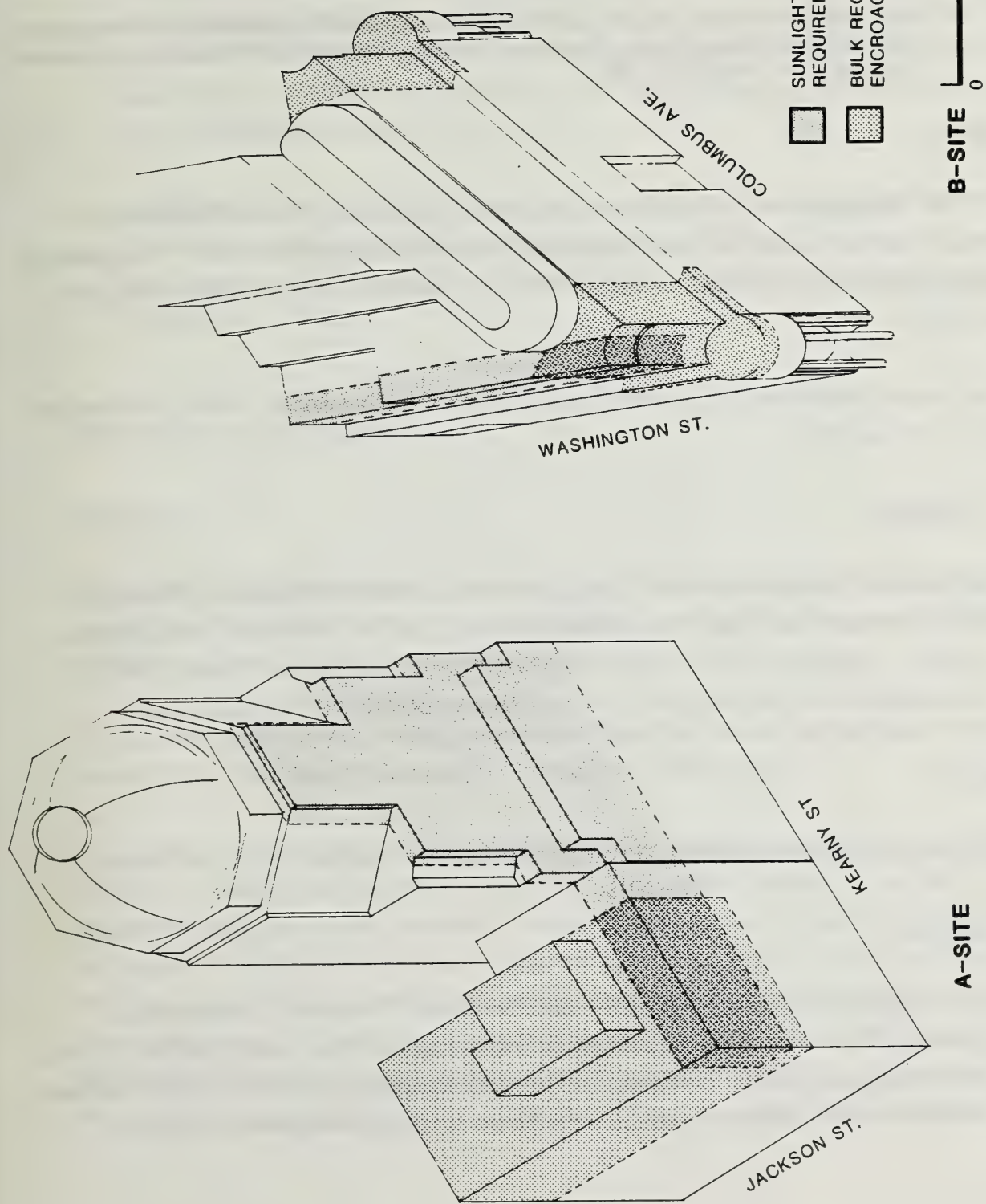


FIGURE C&R 1
DIAGRAM INDICATING REQUESTED
BULK EXCEPTIONS (A-SITE AND B-SITE)

SOURCE: Heller and Leake

X. Summary of Comments and Responses

NOTE - Housing

- /1/ Henry Wong, Deputy Director of Housing Division, Federal Housing Administration, telephone conversation, April 20, 1987.
- /2/ Joel Posner, Community Planner and Development Representative, Community Development Block Grant Program, Federal Housing Administration, telephone conversation, April 20, 1987.

Comment

"p. 15-33 The discussion of project characteristics should identify that the residential component of the project includes a specified amount of community space. This space is an important part of the proposed design and is of service to the community." (Rolland Lowe, CAC)

"In this report I don't see any allowance for any sort of a community center, community activities." (Sue Chin)

Responses

No community space was specifically identified for the DEIR project, although the project sponsor was considering including 2,000 sq. ft. in the residential portion on A-Site. Alternative G (see pp. 370 to 381) is the project sponsor's preferred plan; Alternative G includes a 6,600 sq. ft. community center, on the fourth floor.

Comment

"What space would be counted as on-site open space?" (Chinatown Resource Center)

Response

The second full sentence on p. 20 of the EIR states, "The project would provide 4,270 sq. ft. of open space on the roof of the residential tower, and 2,500 sq. ft. in a courtyard in the rear of the buildings. The project would also include a walk-through arcade from Kearny Street through to Gibb Street (which would be improved)."

X. Summary of Comments and Responses

Under the Chinatown Permanent Controls, the open space requirement for the project is about 3,830 sq. ft. of common usable open space for the residential portion of the project and 3,995 sq. ft. for the commercial portion. The project would provide a total of 6,770 gsf of open space (not including the walk-through arcade and improvement of Gibb Street) on A-Site. The additional open space requirement of approximately 1,055 gsf would be met by the improvement of off-site open space and/or the payment of an in-lieu fee.

Alternative G, the project sponsor's preferred plan would provide about 9,400 sq. ft. of common usable open space in a rooftop terrace (6,704 sq. ft. of common useable open space would be the minimum amount required under the Chinatown Permanent Controls).

GIBB STREET AND ILS LANE

Comments

"Except for the first paragraph of page 20, there is no information about the walk through arcade from Kearny Street through to Gibb Street, which is to be improved. This needs to be elaborated upon." (Mark Ryser, Heritage)

"Analyze the proposed walk-through arcade to Gibb from Kearny with respect to security issues." (Toby Rosenblatt, President, City Planning Commission)

"We are the owners of the building located at 53-55 Columbus Avenue, situated between Gibb Street and Ils Lane [see Figure on p. 185]. Our property consists of offices on the ground level and apartments for mostly senior citizens on the 2nd and 3rd floors. Because our property is sandwiched in between the Pan Magna Plazas Site A and Site B, we are most concerned about the safety and convenience of our elderly tenants both during and after construction. Of special concern to us is whether Gibbs Street and Ils Lane will be used by the Pan Magna Plaza as an access street for motor vehicles to serve the proposed project. This would create a serious traffic hazard to our tenants." (Stanley Fong)

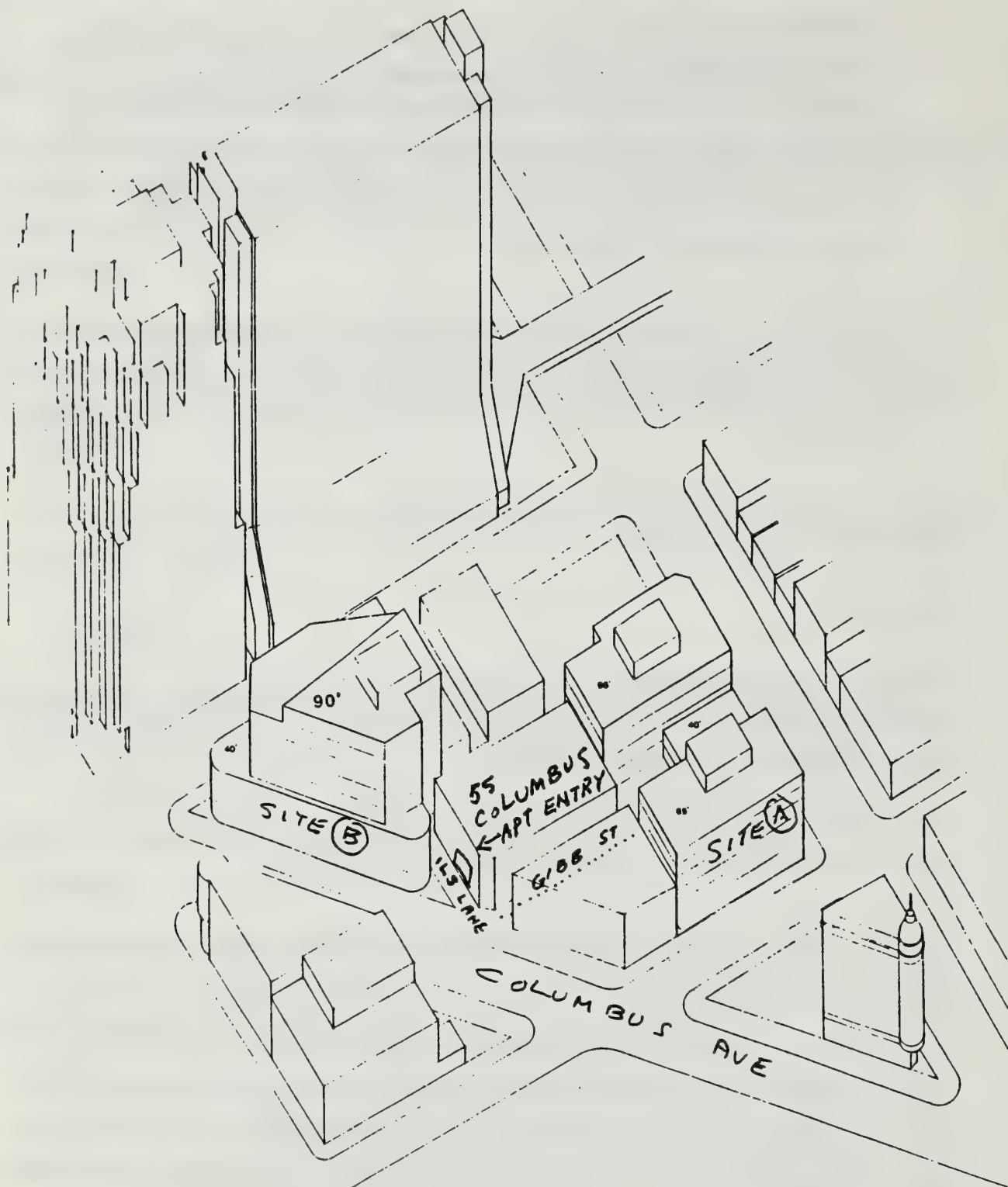


FIGURE 35
CODE CONFORMING
(WITH CU) ALTERNATIVE

Responses

As shown in the EIR, on p. 25, with the DEIR project it would be possible for pedestrians to walk through an arcade in the building on A-Site between Gibb Street and Kearny Street. With the DEIR project (and Alternative G, the sponsor's preferred plan), Gibb Street would be repaved, and a six-ft.-wide sidewalk would be added. New lighting fixtures would also be added along Gibb Street.

With both the project and Alternative G, access to project buildings would be restricted outside of working hours. Access to Gibb Street (a public street) would not be restricted. The potential for crime on Gibb Street would be the same as that on similar streets in the area.

As stated in the last paragraph on p. 17 of the EIR, and illustrated in Figure 6, p. 25, vehicle access to buildings on A-Site would be from Jackson Street. As stated on p. 20, fifth paragraph of the EIR, and illustrated in Figure 12, p. 31, of the EIR, vehicle access to the B-Site building would be from Washington Street. With the DEIR project, neither Gibb Street nor IIs Alley would serve as vehicle access to project buildings.

Under Alternative G, the project sponsor's preferred plan, Gibb Street would be used for truck egress (not access) from A-Site. There would also be a pedestrian entrance/exit onto Gibb Street. However, no walk through arcade is proposed under Alternative G. Pedestrians could enter the retail complex at Kearny Street, descend to the lower retail level on escalators, and exit on Gibb Street. See pp. 370 to 381.

TENANTS

Comment

"It is not clear what kind of retail tenants are proposed for the ground floor retail. If these are anticipated to be Chinatown serving, then some analysis is required to determine the impacts of this very different kind of retail use. Chinatown stores

X. Summary of Comments and Responses

typically do a very high volume of business and pay high rents as a result. Another common characteristic is the high proportion of merchandise space and low amount of storage space in a given retail store. This in turn requires a larger number of deliveries and loading activity. Does the EIR calculation include this as its worse-case scenario in assessing project impacts on the community?" (Michael Louie, TRIP)

"Specify types of retail shops which would be housed in the project. Specify types of jobs to be created in the office towers." (Chinatown Resource Center)

Responses

No specific tenants nor particular markets have been identified for office or retail space. As discussed in the EIR, the site is located at the juncture of four identifiably distinct districts. As such, tenants could reflect any or all of these districts. Project impacts have been projected on the assumption that tenancies will reflect those of the adjacent C-3-0 District. Average data on this district represents a spectrum of office and retail tenants. For comparison, an analysis of project transportation impacts assuming office and retail tenants similar to those in Chinatown is included in this document beginning on p. 244.

MEMORANDUM OF UNDERSTANDING

Comments

"I challenge the ability of the Mayor to sign off on this agreement that is referred to in here and that is in the department's files. There is no legal authority under CEQA for the Mayor to be prejudging projects before there is environmental review, and especially prejudging projects that the Planning Commission, which exists at her will and can be removed at her will, as we all know, is coming to you. That is really warped. And I challenge the Mayor's ability to do that." (Sue Hestor, SFRG)

"What is the legal authority of a 'Memorandum of Understanding?' Upon whom is it binding?" (Chinatown Resource Center)

X. Summary of Comments and Responses

"p 136-38. The Impact on Housing Section should reflect the recent modifications to the Memorandum of Understanding approved by the committee, working with the developer and in coordination with the Mayor's Office on February 6, 1986 and March 20, 1986, especially the agreement to hold rents to 25% of Social Security Income and the revisions of the housing unit number and mix to 80 single and 40 double units." (Rolland Lowe, CAC)

"The Memorandum Of Understanding. The DEIR makes reference to a Memorandum of Understanding (the 'Memorandum') between the project developers and Mayor Feinstein. A copy of the Memorandum is included in the DEIR appendix at A-55, et seq. The reference to the Memorandum inevitably endows it with the appearance of legal effect, the appearance that some aspect of the project has already been approved.

"If the DEIR makes reference to the Memorandum at all, it is inadequate as an instrument to inform the public unless it also clearly states that the Memorandum has no legal significance of any kind whatsoever. The Mayor has no authority to approve amendments to the Master Plan, adopt zoning legislation, grant variances from height restrictions or issue conditional use authorizations. All of those decisions fall within the purview of other elected and/or appointed officers of the City and the Mayor's office has no part in any of those activities except to the extent of the Mayor's right to sign or veto zoning legislation after it has been adopted by the Board of Supervisors.

"To the extent the Memorandum implies a decision to approve the project, then it was made without prior environmental review and renders the entire exercise, of which the DEIR is a part, a classic case of post hoc rationalization, condemned by the Supreme Court of the State of California in No Oil Inc. v. Los Angeles, 13 Cal. 3d 68 (1974)." (Howard Ellman)

"It is appalling to me that when memorandums of understanding are reached and signed, that they can be ignored as if they didn't exist. Specifically, points #2 and #3 of the memorandum signed by the Mayor, Four Seas and Rolland Lowe, CAC. By your own accounts, variances (exceptions to the laws) must be given for height and other non code conforming design features of this plan, in opposition to specific demands to conform to existing codes. And the agreed upon number of housing units to be developed gets monkeyed with." (Don Chan)

"The only way this project could be approved as proposed is if the Planning Commission, the Board of Supervisors, and ultimately, the Mayor accept the developers' apparent contention (e.g., DEIR, pp. 3-4, 34) that the Memorandum of Understanding gives them the license to rewrite the City's Master Plan and land use ordinances to their liking."
(Howard Ellman)

Responses

The Memorandum of Understanding signed by the Mayor, Four Seas Investment Corporation and the Citizens Advisory Committee presents the mutually agreed upon common understanding of the project by these three parties. The document does not state, and is not intended to imply, that the project has received some form of prior approval. It does state that the Mayor will recommend that Community Development Block Grant (CDBG) Funds be allocated to the project, that the development be assisted by tax exempt bonds, and that the Mayor will support provision of assistance to prior I-Hotel tenants. The document also includes a description of the basic components of the project, and the Citizens Advisory Committee's commitment to "support" the development package and allocation of CDBG Funding. A new Memorandum of Understanding was signed in February 1987, see Attachment III of this document. The project must be approved by the Planning Commission before it may proceed. Required approvals are listed beginning on p. 213.

HISTORY OF A-SITE

Comments

"P. 52 Al Robles, CAC member, volunteered to provide a copy of a 14 page history of events in the I Hotel over a 100 year time span. It was suggested this history, compiled by the Kearny Street Research project, be footnoted in the description of historical resources." (Rolland Lowe, CAC)

"Page 34. There is one paragraph on the history of the I-Hotel project prior to October of 1979. I find that very sad when we look at this as one of the turning points in housing policy in this city. When we talked about 1000 Montgomery, the papers reported that as the biggest housing controversy since the International Hotel. We measure things in this

X. Summary of Comments and Responses

city by the I-Hotel experience. And as someone who was there at 3:00 o'clock in the morning on August 4th in 1977, as one of 2,000 people who stood between 400 riot police and the dozens of 60- and 70- and 80-year-old tenants, I cannot believe that we don't dedicate more of the discussion of the history to what this meant to the city. Why were we there, why were the taxpayers paying to beat people up? The person in front of me had his head split open by a policeman with a baton. And why did we do that? So this same developer, this same project sponsor could build an office building. I think we need to have something in the EIR about that and what it meant to people in the city and what it still means." (Bradford Paul, NOMPC)

"As a person who used to be down there in the I-Hotel block, it is an emotional history. I agree with the previous speaker about the history. It should be more clearly stated, more elaborately stated, because there is a lot to learned from that, as you get back into the technical things of the EIR and other things, very worthwhile and worth arguing. I think [if] you take the history for what it is, you should deny this project on that basis." (Don Chan)

Response

Prior history of a project site other than to demonstrate previous uses on the site, is not normally included in environmental review of a project. As the commenters note, the history of A-Site has been long and controversial. On p. 34 of the EIR, the key events in this history are described.

The following is added before the first paragraph on p. 34 of the EIR:

A-Site, the location of the International Hotel (which was demolished in 1979) has been at the center of controversy and debate about San Francisco housing policy for many years.

The following is added to footnote/2/ p. 37a of the EIR.

Additional information on the social and political history of the International Hotel site is available from a variety of sources. A history of events over a period of 100 years has been compiled by the Kearny Street Research Project, and is also available in the project case file. A movie, "The Fall of the International Hotel," was produced. The events summarized in the text were covered in the local press as well.

SCHEDULE AND COSTS

Comment

"Will housing be built in the first phase of construction - what is the construction schedule?" (Chinatown Resource Center)

"p. 35. Please explain when project occupancy might be completed. What is the likelihood of project occupancy by 1990, by 1995, by 2000?" (Georgia Brittan, SFRG)

Response

Since publication of the DEIR, the project sponsor has reconsidered the project. Alternative G is now the sponsor's preferred plan. Under Alternative G, construction on A-Site (including the residential units) would be started and substantially under way prior to commencement of construction on B-Site. (See February 3, 1987, Memorandum of Understanding 4(B).)

The project sponsor anticipates that construction on A-Site would begin in mid-1987, with initial occupancy occurring in early- to mid-1989. Construction on B-Site would probably begin sometime in 1988-1989, with initial occupancy possible in 1991-1992.

Comment

"Please re-do economic analysis on page 35. Bring all numbers up to 1986 projections." (Toby Rosenblatt, President, City Planning Commission)

"Are the rent figures cited 25% of Social Security Income per the agreed-to formula? Why were 1984 dollars used?" (Rolland Lowe, CAC)

"Another area which the Draft EIR doesn't adequately address concerns the affordability of the housing proposed. There needs to be some clarification as to whether the rent subsidy for the units would be what we have heard as 25 percent of SSI income for 40 years and whether this subsidy will extend to all tenants for that 40-year period or does it just extend only to former I-Hotel tenants? Obviously, we would advocate for total affordability." (Deborah Lim)

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Response

The estimated construction cost of Alternative G, the project sponsor's preferred plan, is about \$25 million (1987 dollars), including demolition, and building shell and interior improvements. The total cost for both buildings, including land, architectural and engineering fees, and tenant improvements, would be about \$32 million (1987 dollars). Office and retail space are expected to rent for amounts which are somewhat lower than those originally stated in the EIR but the amount of rental will ultimately depend on market conditions. The total cost of the housing portion of the project would be about \$7.5 million (1987 dollars). The project has received a commitment of \$3 million in funds from the City to subsidize construction of the housing on A-Site. Remaining funds for the housing component of the project would be raised from limited partners investing in the partnership which would own and operate the housing component of the project. Housing units would rent (monthly) for no more than \$225 for single units and \$325 for double units. For more information about the proposed financing of the project, see the Memorandum of Understanding, Attachment III of this document.

The maximum amount of income which any individual may receive from Social Security during 1987 is \$770 per month. The average monthly rental for project tenants would be 25.69% of the 1987 Social Security maximum monthly payment. (This percentage is less for tenants in double units and greater for tenants in single units.) Social Security income will almost certainly be higher in 1989 and will increase throughout the 40 year life of the Project. Rents will not increase at all until 1994 and thereafter will increase at 80% of the Consumer Price Index per year. Therefore, throughout the term of the project, rents are likely to be an increasingly smaller percentage of Social Security income. The rental to be charged is consistent with the agreed upon formula set forth in the Memorandum of Understanding between the Mayor's Office, Four Seas and the CAC (see 3(e) of the July 9, 1984 MOU and 3(A) (ii) (a) of the February 3, 1987 MOU).

Comment

"Please clarify pg. 35 - the project sponsor will put no funds into the housing? The City will have the credit obligation on the tax-exempt bonds, but the sponsor would pay all

X. Summary of Comments and Responses

interest costs (from residential and office rent revenues)? Who pays interest if project revenues are not sufficient? Who pays principal repayments of bonds on maturity?" (Toby Rosenblatt, President, City Planning Commission)

Response

Since publication of the DEIR, the City and the project sponsor have reconsidered financing of the project. The original plan for financing the DEIR project was never finalized but would probably have resulted in the City having the credit obligation on tax-exempt bonds, and the sponsor having to pay all other costs.

For Alternative G, the project sponsor would, in order to finance the housing, donate the air rights on which housing is to be built and the "soft" construction costs (e.g. architect, engineers, attorneys, financing interest during construction, and offsite improvements, such as utility connections, foundations, and underlying structure) to a nonprofit corporation. These items have a value of about \$4,000,000. The remainder of capital needed to construct the housing would be derived from a city grant of approximately \$3,000,000 and the sale of federal tax credits to limited partners investing in the partnership which would operate the housing component of the project. There would be no tax-exempt bond financing, and therefore, no need for the project revenues to service debt. Project revenues would be sufficient to pay for ongoing operations. It is the opinion of the Mayor's Office of Housing and Economic Development that the project is financially viable. The City would have no obligation, direct or indirect, to support the project beyond its \$3,000,000 grant.

Comment

"What provisions are proposed to insure that residential use will be only for elderly and handicapped for life of the building?" (Toby Rosenblatt, President, City Planning Commission)

Response

The housing component of the project would be owned and operated by a limited partnership. The general partner of the partnership would be a nonprofit, tax-exempt

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corporation governed by a board of directors consisting, in part, of representatives of the Chinatown community and the City. The partnership would be obligated to provide low-income elderly housing through several means. First, the partnership would be controlled by individuals and entities with a specific interest in maintaining the housing as low-income housing.

Second, Four Seas and, ultimately the partnership described above, would have to comply with the terms of the Memorandum of Understanding signed by the Mayor, Four Seas and the Citizens Advisory Committee on the International Hotel. Pursuant to the Memorandum of Understanding, the rent for single units of housing would not exceed \$1.00 per square foot, and initial rents for single units would be \$225 per month. Rent would be fixed at this level for a period of five years from initial occupancy. Thereafter, rent increases would be allowed at a rate equal to 80% of the annual consumer price index (for all consumers in the San Francisco - Oakland Metropolitan area as published by the Department of Labor). This rent structure would have to be maintained pursuant to the terms of the Memorandum of Understanding for a period of 40 years.

Third, the City would provide a \$3,000,000 grant to a nonprofit corporation, which would ultimately be loaned to the partnership. The grant funds would be restricted for use in a manner consistent with the Memorandum of Understanding.

Fourth, Four Seas would donate the air rights and funds to cover the "soft" construction costs to the nonprofit corporation. This corporation would in turn lend the partnership the Funds to pay for such soft costs, and it would lease the air space to the partnership, all upon the condition that the partnership continues to operate the project as a low-income housing project for 40 years. Failure to do so would be deemed an event of default under both the loan and the lease from the nonprofit corporation.

Comment

"Page 35: Explain [\$]16.5 million differences between replacement cost and construction cost." (Chinatown Resource Center)

Response

Four Seas Investment Corporation is a California corporation organized pursuant to the California Corporations Code. It is adequately capitalized, and all of its money is legally in the country. Moreover, a California limited partnership, in which Four Seas will have no interest and which will be controlled, in part, by representatives of the Chinatown community and the City, will be operating the low-income housing component of the project.

LAND USE AND ZONING

COMPATIBILITY WITH NEARBY USES

Comments

"The two office towers would be inconsistent with the three roles assigned to Chinatown in the CRS [Chinatown Rezoning Study]: 1) residential village; 2) capital city for the Bay Area Chinese population; and 3) center for tourism. They would also be inconsistent with the economic objectives for Chinatown and North Beach contained in the 1984 Community Development Plan prepared by the Major's Office of Housing and Development: 1) the creation of jobs for low and moderate income persons; 2) the retention of small businesses; and 3) the development of zoning controls which would ensure the neighborhood service orientation of commercial facilities, particularly local resident-serving facilities. To the contrary, the two office towers would encourage a high-rise office invasion of both Chinatown and North Beach." (Howard Ellman)

"I work in the Colombo [sic] Building slated for demolition under the proposed Pan Magna Plaza development. I have read a good proportion of the Draft EIR, and last week I attended the planning commission hearing on the adequacy of the EIR. I am not a skilled city planner, but my impression as a citizen is that the EIR fails to capture not only the specific negative impacts of the proposed development on the character of the Chinatown, North Beach, and Jackson Square areas but also the cumulative impacts of such mid-rise development on these unique neighborhoods." (John A. Knox)

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"The proposed use of the two sites (spoken to as a single entity in the plan)--- while not appearing radically out of place when seen in relation to some of the gross examples of the financial district, nor seemingly without concern for housing, etc. (meeting the bare requirements of the OAHPP) -- when seen in its overall impact on Chinatown, leaves a whole lot to be desired." (Don Chan)

"We are pleased by the innovative partnership which results in housing on-site for 160 seniors and disabled persons. We want to see housing on that site. The Draft EIR describes three buildings -- housing at Kearny and Jackson, a 196-foot office tower next to that, and another office building at Columbus and Washington. The Columbus and Washington corner is not an inappropriate site for office development, and we are pleased that the sponsor has chosen to avoid any debate over the significance of new shadows by scaling down the project." (Cynthia Joe, Chinatown Resource Center)

"I am a color and design graduate. I am also one of the relics from the Kearny Street workshop, which no one mentioned. Also I want to say I traveled to different cities, and especially New Orleans. What is New Orleans famous for? The French Quarter. San Francisco is famous for Chinatown, North Beach. In the City of New Orleans no structure can be demolished without permission from the preservation authorities, because they want to keep the tone and the atmosphere of a particular neighborhood. And this is important. North Beach, Chinatown. And if you continually bring buildings that are out of scale and that are ugly looking, the whole atmosphere is lost. The tourists will turn to other cities like New Orleans. They will go somewhere else where there is atmosphere, like the French Quarter. But I wish to say that we must not lose the flavor of our district, because Chinatown, North Beach has been the main attraction for tourists. And think of New Orleans. They have preserved their buildings and preserved their French Quarter." (Sue Chin)

Responses

The Chinatown Rezoning Study conducted by the Department of City Planning, began in 1983. Between 1983 and 1986, the Department prepared five issue papers providing information and analysis on planning issues in Chinatown. The publication of each issue paper was followed by a community forum, conducted in both English and Cantonese, to discuss staff findings. Conclusions about the future of Chinatown

X. Summary of Comments and Responses

"Basically one critical element of this project involves the construction of a C-3 type use north of Washington Street, when it's a fundamental policy of the Downtown Plan that all such uses should be included within the C-3 District and with the growth orient [sic] south of Market." (Howard Ellman)

"Out of Scale/Change in Zoning. Symbolically, it is a major mistake to approve an office development of this size this far north of Market Street. A project 200 feet high is simply too much, as evidenced by the current zoning. There is no reason to change the zoning laws to allow this large of project at this site. It is indeed ironic that there is so much concern about what's happening in North Beach and with increasing rents in the areas surrounding the site, but then the Commission liberalizes the Planning Code to allow a building of this size as far north as Jackson Street. We simply ask, what is so compelling about this project that would require this kind of zoning change and this type of office project?" (Dick Grosboll)

"I am very troubled by the thought that this Commission would approve this EIR and open the door to the Financial District moving north of Washington Street. I think an essential part of the city's character would be threatened by this project. This is not addressed by the Environmental Impact Report. I think the Commission has a chance to require that that be addressed or reject this project. I think we should hold the line at Washington Street and at the 40-foot height limit.

"During the time I was working at the San Francisco Ecology Center I participated in dozens of discussions over the years which addressed what I took to be the inviolability of the Washington Street line, that no commercial development, no high-rise development, the 40-foot height limit, the Financial District would not march north of Washington Street. In those discussions were planners, supervisors, architects, lawyers, and community activists. For over a decade I have lived believing that that principle was inviolable. I want to ask, what has changed and how does the EIR address this change that would warrant moving, changing this principle?" (Mark Kasky)

"I do not understand how regulations are made and then become subject to the special interests of builders. It would be a crime to fill in the basin between Russian Hill and the Bay. Also, what has happened to the Washington Street boundary line as it relates to height restrictions?" (Robert L. Sockolov)

X. Summary of Comments and Responses

Response

The City Planning Department has no record of an agreement with Crow Spieker Companies and Neighborhood groups concerning the northern boundary of the C-3-0 District. However, there is no proposal to change that boundary. The Chinatown Plan (Master Plan amendment approved February 19, 1987, Resolution 10929) designates the north side of Washington Street between Columbus and Kearny for Chinatown Community Business (CCB) uses. The south side of Washington Street continues to be the northernmost boundary of the C-3-0 District. The Chinatown Plan differentiates the functions and activities in Chinatown from those in downtown. Office use, although at a lower scale than C-3-0 office development, continues as a permitted use in the CCB district. The second sentence of the second paragraph on p. 77 of the EIR is changed to read as follows (new language is underlined):

The two office structures proposed for the project would extend the increased scale of office and retail uses of the Financial District across Washington Street, which is the northern boundary of the C-3-0 district and currently serves as the northern boundary of the concentration of newer office development in the Financial District.

For more discussion of the Master Plan as it applies to the project, see pp. 218 to 219.

The EIR describes the proposed project and its relationship to adjacent uses and the scale of adjacent buildings. The City Planning Commission in deciding whether to approve or disapprove the project or one of its alternatives will determine whether or not the project is appropriate for its location.

ZONING

Comments

"I purchased and live in a residence across the street from the project area. My residence at 611 Washington Street was purchased partially based on representations made by the Trammel-Crow Organization and my review of building regulations. It is my

understanding that there is a height limitation in effect in San Francisco that would restrict this project." (Robert L. Sockolov)

"On Page 43 of the EIR, [t]he zoning is set out and the FAR is set out under the kind of Rottenborough system that exists for areas around downtown, because of the Downtown Plan ring, the ring around downtown, which hasn't yet been corrected.

"This department and this Commission knows that in November of 1984, Mr. Williams made a staff presentation that said we have a problem, we have inappropriately high FAR's in three basic areas, and one of them is Chinatown, where the FAR technically in the code exceeds that of the C-3 Office District, which makes a strong incentive to put office space in there. And yet the discussion on Page 43 kind of slides over that. It slides over the fact that the staff said that that is wrong and it needs to be changed, and it's supposed to be changed to about a 4-to-1 FAR.

"So, we measure this project against a 10-to-1 standard when everyone knows that is out the window and is an inappropriate measurement. This is important because this project is allowed to become a 10-to-1 project as a result of that discussion. It taints the whole EIR, it taints what you're looking at, and there needs to be, if necessary, the staff going back to the transcripts of the Planning Commission presentation by Mr. Williams about the problems. If they can't find it, I would be glad to look it up because I have it in my records.

"On Page 77 of the EIR, the discussion of land use and zoning, is a further example of this problem. This section has a lot of problems. On the next page [p. 79], this is exactly where you need to talk about how the department intends to change that zoning from 10-to-1. On Page 140, you need to discuss the patterns that -- you assume C-3 patterns in non-C-3 districts in this EIR, and that is contrary really to the Downtown Plan which says that the C-3 District [is] a different kind of district." (Sue Hestor, SFRG)

"Misleading Discussion Of Zoning Constraints. The DEIR states in several places that the property is controlled by various zoning constraints and compares the proposals against those constraints. Although the statements are, in most cases, true as far as they go, they are misleading in context. For example, the DEIR evaluates the project against a

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floor area ratio of 12.0 to 1 which is said to be applicable to the site. See, for example, DEIR pp. 9, 43. The Downtown Plan, of course, establishes a lower FAR within the C-3-0 District which is supposed to be the most densely developed area within the City in terms of floor area ratio. In other words, the 12.0 to 1 FAR can have no residual validity and, at the same time, be made consistent with controls established by the Downtown Plan. Thus, it is misleading to say to the public (as the DEIR repeatedly does) that the project proposal is less dense than the 'allowable' FAR. The only reason that the 'allowable' FAR would still accommodate this project is because the City has failed to make its Master Plan internally consistent and conform its zoning ordinances. (Howard Ellman)

"What, if any, conflicts exist between [the] project's proposed uses and allowed uses under existing C-2-C interim controls; and is project exempt from those use controls?" (Toby Rosenblatt, President, City Planning Commission)

"Chapter III Section A 'Land Use and Zoning' should include discussions of the Department's Chinatown Plan as it is applicable to the issues raised by this project.

"In several locations, in the draft report, bonuses for thru [sic] lots are mentioned. This term needs to be defined and an explanation of why it is applicable provided." (Mark Ryser, Heritage)

"The fudging with zoning codes, interim controls, or outright attempts to set dangerous precedents with newer, looser 'controls' is a serious matter of concern also. Chinatown has always been caught on a middle ground in elevation between the behemoth financial district towers and the high and mighty Nob Hill . . . [residents]. The only thing which saves Chinatown from total submersion by both outside and inside forces is the height controls." (Don Chan)

Responses

The Downtown Plan regulates the C-3 district; neither of the project sites is within the C-3 district. The project sites are within the area covered by the Chinatown Plan.

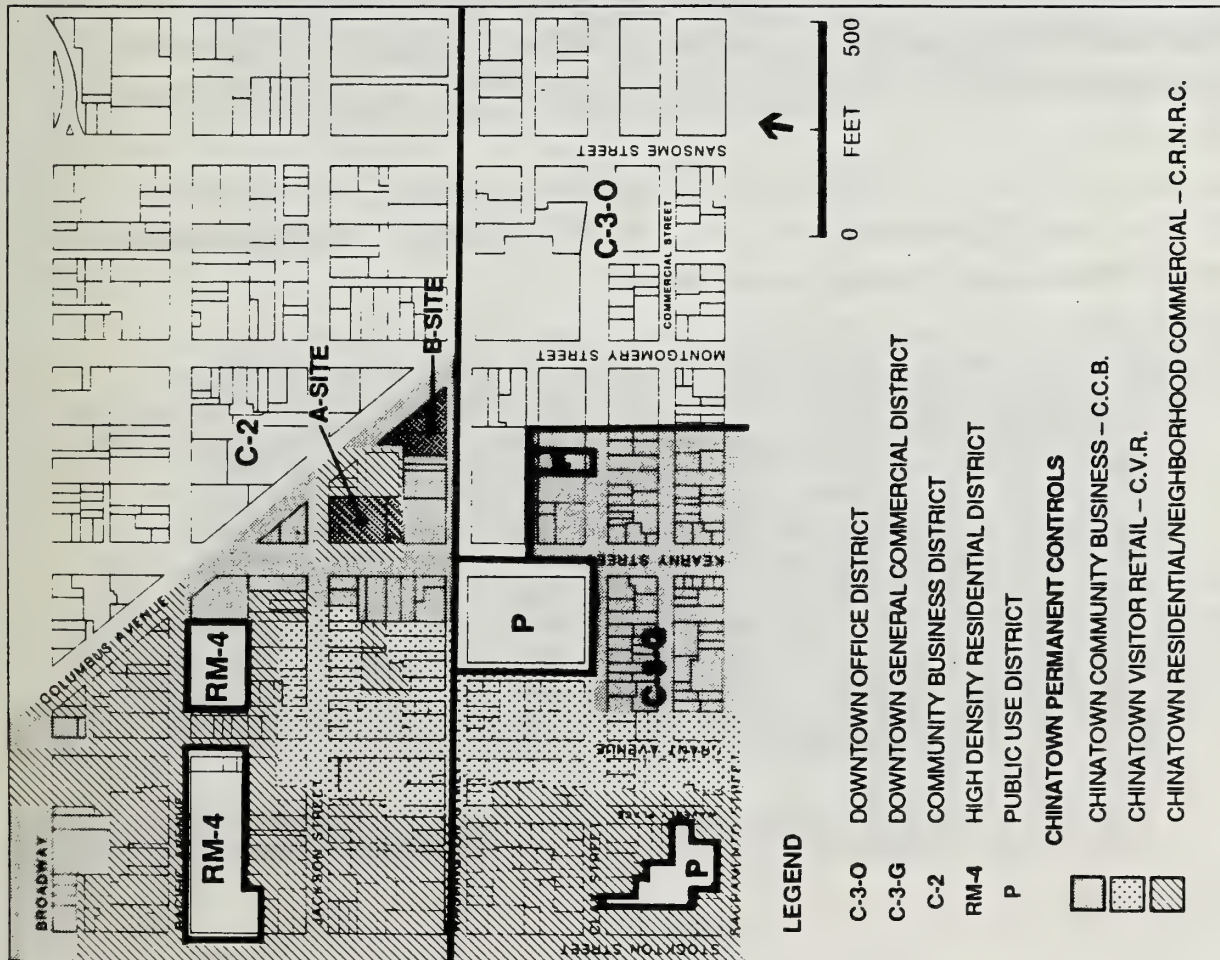
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The commentor is correct in stating that in 1984 the Department of City Planning identified inconsistencies between the Downtown Plan and the zoning controls for surrounding neighborhoods. The Chinatown Rezoning Study, the Chinatown Plan, and subsequent Controls are a response to this inconsistency and other problems identified by community groups and Department staff. Both an amendment to the Master Plan incorporating policies for Chinatown and Permanent Zoning Controls consistent with these Master Plan policies were approved by the Planning Commission on February 19, 1987. The ordinances implementing the Permanent Controls were adopted by the Board on April 13, 1987 and signed by the Mayor on April 24, 1987. They are effective as of May 24, 1987. Figure 16, p. 44 of the EIR, is revised herein (see p. 206) to indicate the Use districts and Height and Bulk districts, as revised by the Chinatown Permanent Controls.

The new controls supercede both the Interim Controls and underlying permanent controls which were discussed throughout the DEIR. The following discussion describes the EIR project and Alternative G, the sponsor's preferred alternative in terms of the new permanent controls.

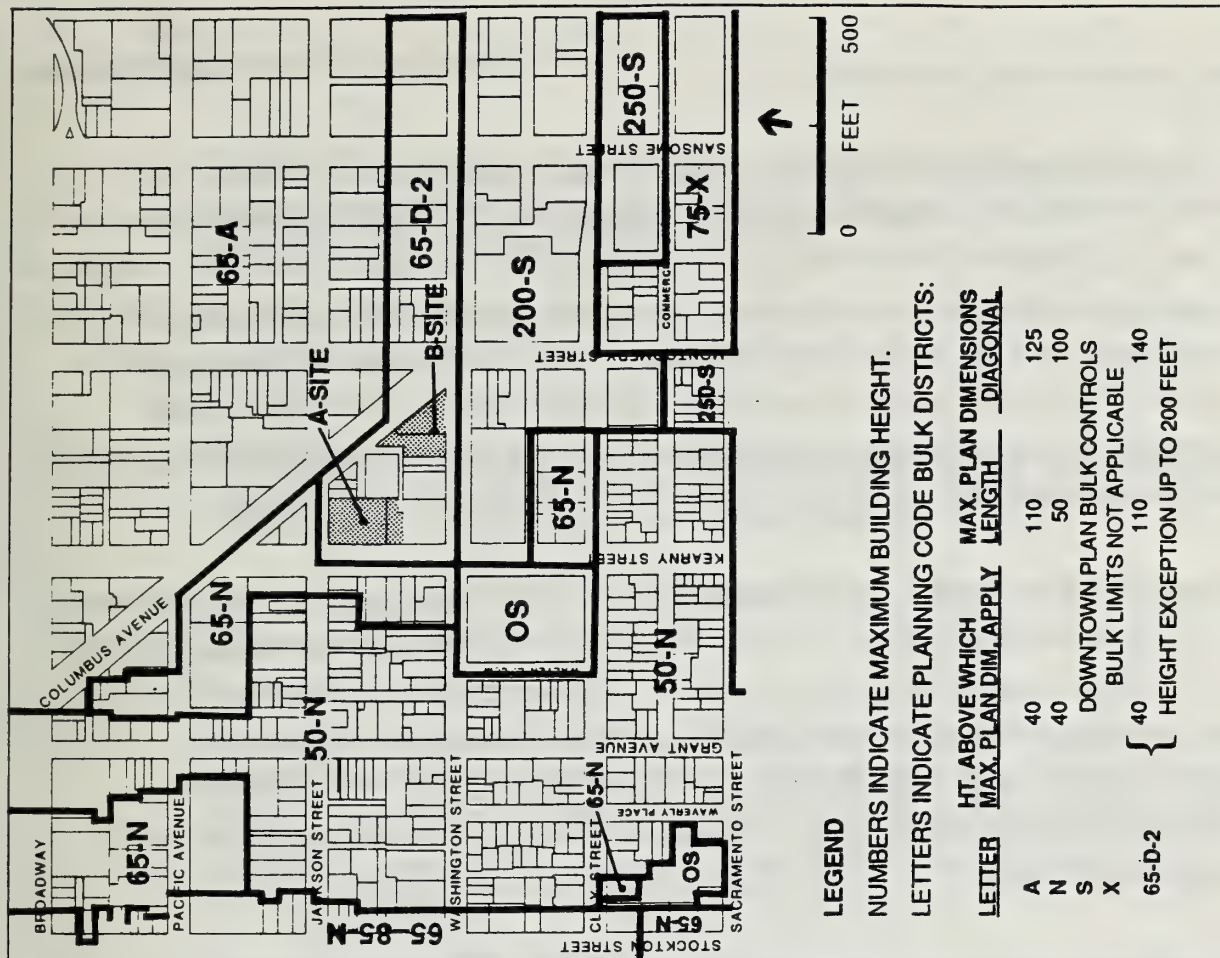
Under the permanent controls, the commercial FAR limit for A-Site (in the Chinatown Residential Neighborhood Commercial district) is 1.0:1 and for B-Site (in the Chinatown Community Business district), 2.8:1. There is no limit to the floor area devoted to housing. However, this FAR limit would not apply to the proposed project, in accordance with Section 124.1(a) of the Permanent Controls, which provides that developments with a commitment for Community Development Block Grant (CDBG) funds as of January 10, 1985 for creation of new housing can be developed under the FAR of the underlying zoning that was in effect as of January 9, 1985. As discussed on p. 79 of the EIR, the permitted FAR for both sites is about 12.0:1, including corner and "through" lot premiums (a through lot has a rear lot line which abuts upon a street or alley, Section 125(b)). As stated in the last sentence of the first paragraph on p. 79 of the EIR, "The FAR proposed for the project on A-Site would be about 9.7:1 (including residential use and non-accessory parking in the floor area calculation); the FAR proposed for the project on B-Site would be about 7.0:1."

The FAR for the building on A-Site in Alternative G, the sponsor's preferred plan, would be 7.5:1 including residential space or 4.8:1 not including residential space.



SOURCE: Department of
City Planning,
San Francisco

PLANNING CODE USE DISTRICTS



● FIGURE 16
PLANNING CODE HEIGHT AND BULK DISTRICTS
EFFECTIVE MAY 24, 1987

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The Chinatown Permanent Controls include reclassification of A-Site from 65-A to 65-D-2. Height exceptions in a 65-D-2 Height and Bulk District may be approved by the City Planning Commission up to a height of 200 ft. (Section 263.1 (a)). Under the permanent controls the project would not require height reclassification. The last paragraph on p. 35 of the DEIR is deleted. Under the Permanent Controls height above 35 ft. would require Conditional Use authorization. The project (and Alternative G) would require Conditional Use authorization for the buildings on both A-Site and B-Site.

Density for residential uses are governed by the number of units per lot size; under the Chinatown Permanent Controls, the permitted dwelling unit density is one unit per 200 sq. ft. of lot area (Section 207.5). If dwelling units are designed for or occupied by senior citizens the number of units allowed may be doubled, (Section 209.1(m)). With the DEIR project, A-Site would provide 120 units, or 68 units less than permitted. Alternative G, the sponsor's preferred plan would provide 126 units.

The controls implementing the Chinatown Plan permit cultural, religious, civic, and social associations, housing, and mixed uses such as retail and office. The uses proposed for A-Site and B-Site are permitted uses under the Chinatown Permanent Controls.

The first two full paragraphs on p. 2 of the EIR, in Chapter I, Summary are revised to read as follows (new language is underlined):

Under the Chinatown Permanent Controls, A-Site is in the Chinatown Residential/Neighborhood Commercial (CR/NC) Use District; B-Site is in the Chinatown Community Business (CCB) Use District. The basic commercial Floor Area Ratios (FAR) in the CR/NC and CCB are 1.0:1 and 2.8:1, respectively. Section 124.1(a) of the Permanent Controls exempts developments (including the Pan Magna proposal) which have received commitment for Community Development Block Grant (CDBG) funds, as of January 10, 1985, for creation of new housing, from these FAR limits. The basic allowable FAR for the project (both sites) under the Permanent Controls is, as under the former zoning, 10.0:1 (in accordance with Section 124(c) of the Planning Code, since both sites are nearer to a C-3 District than to any R District). With through lot and corner lot premiums the allowable FAR for the sites is 12:01 (Section 125 of the Planning Code).

Both A-Site and B-Site are in a 65-D-2 Height and Bulk District with a maximum permitted height of 65 ft.; height exceptions up to 200 ft. in the

X. Summary of Comments and Responses

65-D-2 District may be approved by the City Planning Commission in appropriate cases. Section 254 of the City Planning Code requires Conditional Use (CU) authorization for height over 35 ft.

The second paragraph on p. 3 of the EIR is revised to read as follows (new language is underlined):

The project would not meet the site coverage requirement for Mixed Use Districts under the Chinatown Permanent Controls (Section 134.1); the sponsor would apply for a variance from this requirement.

The first two full paragraphs on p. 5 of the EIR are revised to read as follows (new language is underlined):

The permitted FAR for both sites is about 12:1. The FAR on A-Site would be about 9.7:1 and the FAR on B-Site would be about 7.0:1. The project would be exempt from the CR/NC District FAR of 1.0:1 for A-Site and CCB District FAR of 2.8:1 for B-Site due to the creation of low-income housing which will be partially financed by Community Development Block Grant funds (pursuant to the Permanent Controls, Section 124.1(a)).

The project would exceed the height limit of 65 ft. in the 65-D-2 District and request Conditional Use approval. Heights up to 200 ft. in the 65-D-2 District may be permitted (Section 263.1 of the City Planning Code). CU authorization would be necessary for building height exceeding 35 ft. Both project buildings would require exception from bulk restrictions.

The second and third paragraphs on p. 17 of the EIR are revised to read (new language is underlined):

A-Site is in the Chinatown Residential/Neighborhood Commercial (CR/NC) Use District; B-Site is in the Chinatown Community business (CCB) (CR/NC) Use District, both of which were adopted by the City Planning Commission as Permanent Controls on February 19, 1987. The basic commercial Floor Area Ratios (FAR) in the CR/NC and CCB Districts are 1.0:1 and 2.8:1, respectively. Section 124.1(a) of the Permanent Controls exempts developments (including the Pan Magna proposal) which have received commitment for Community Development Block Grant (CDBG) funds, as of January 10, 1985, for creation of new housing, from this FAR limit. The basic allowable FAR for the project (both sites) under the Permanent Controls is, as under the former zoning, 10.0:1 (in accordance with Section 124(a) of the Planning Code, since both sites are nearer to a C-3 District than to any R District). With through lot and corner lot premiums the allowable FAR for the sites is 12.0:1 (Section 125 of the City Planning Code).

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Both A-Site and B-Site are in a 65-D-2 Height and Bulk District with a maximum permitted height of 65 ft.; height exceptions up to 200 ft. in the 65-D-2 District may be approved by the City Planning Commission in appropriate cases.

The first sentence of the first full paragraph on p. 19 of the EIR is revised to read as follows (new language is underlined):

Under the Chinatown Permanent Controls, the permitted dwelling unit density for the project site is one unit for each 200 sq. ft. of lot area (City Planning Code Section 207.5).

The second full paragraph on p. 19 of the EIR is replaced with the following:

The project would not meet the site coverage requirement for Mixed Use Districts under the Chinatown Permanent Controls (Section 134.1); the sponsor would apply for a variance for this requirement.

The last two sentences of the third full paragraph on p. 19 of the EIR are revised to read as follows (new language is underlined):

The FAR on A-Site would be below the maximum permitted for the project (12.0:1); it would be above the allowable commercial FARs of 1.0:1 for A-Site and 2.8:1 for B-Site contained in the Chinatown Permanent Controls, which exempt developments like the project from the FAR requirements because of the commitment of CDBG funds for housing. (Under the Permanent Controls, residential uses do not count against the FAR of a building; without including residential area, the FAR of A-Site would be about 7.1:1.)

The paragraph beginning at the bottom of p. 19 of the EIR is revised as follows (new language is underlined):

The Chinatown Permanent Controls require 48 sq. ft. of private open space per dwelling unit (5,760 sq. ft. for the project) which may be substituted by common usable open space in a ratio of 1.33:1 (7,661 sq. ft. for the project). For dwelling units specifically designed for and occupied by senior citizens, the minimum amount of usable open space which can be provided is one-half the amount required or 3,830 sq. ft. of common usable open space for residential uses in the project. The Chinatown Permanent Controls also require one sq. ft. of open space for each 50 sq. ft. of commercial space, or 3,994 sq. ft. for the project (both sites). The project would provide 4,270 sq. ft. of open space on the roof of the residential tower, and 2,500 sq. ft. in a courtyard in the rear of the buildings. The project would also incorporate a walk-through arcade from Kearny Street through to Gibb Street (which would be improved). The additional open space requirement of approximately 1,055 sq. ft. would be met by improvement of off-site open space and/or the payment of an in-lieu fee.

X. Summary of Comments and Responses

The last sentence in the third paragraph on p. 20 of the EIR is revised to read (new language is underlined):

The FAR of the building on B-Site would be about 7.0:1 (below the maximum of 12.0:1 permitted for the project but above the allowable FAR of 2.8:1 contained in the Chinatown Permanent controls).

The last sentence on p. 35 of the EIR is deleted from the EIR, as this request is not necessary under the Chinatown Permanent Controls.

The first two sentences in the first paragraph on p. 36 of the EIR are revised to read as follows (new language is underlined):

The project would require Conditional Use (CU) authorization for building heights over 35 ft. (pursuant to the Chinatown Permanent Controls). The project would require a CU for height above 65 ft. in a 65-D-2 District.

The last paragraph on p. 36 of the EIR is revised to read (new language is underlined):

The project would not meet the Planning Code site coverage requirement for Chinatown Mixed Use Districts (Section 134.1). In Mixed Use Districts at the lowest story occupied as a dwelling, the site coverage allowed is no more than 75%. The non-covered area requirement may be provided in a location other than the rear yard, including roof top terraces and balconies. The project sponsor would seek a variance from this requirement.

The zoning discussion contained in the first two paragraphs on p. 43 of the EIR, is revised to read as follows, to reflect the new Chinatown Permanent Controls (new language is underlined):

Under the Chinatown Permanent Controls, A-Site is in the Chinatown Residential/Neighborhood Commercial (CR/NC) Use District and B-Site is in the Chinatown Community Business (CCB) Use District. The Chinatown Permanent Controls were adopted by the City Planning Commission February 19, 1987, and the Board of Supervisors on April 13, 1987 and signed by the Mayor, April 24, 1987; they become effective as of May 24, 1987. The basic commercial Floor Area Ratio (FAR) for the CR/NC District is 1.0:1 and 2.8:1 for the CCB District. The project would be exempt from both CR/NC and CCB FAR limits because of the creation of low-income housing on A-site, which will be partially financed by Community Development Block-Grant (CDBG) funds (pursuant to Section 124.1 (a)). This section provides that developments with a commitment of CDBG funds as of January 10, 1985 for the creation of new housing can be developed under the FAR of

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the underlying zoning that was in effect as of January 9, 1985. The basic FAR for the project sites is, as under the underlying C-2 zoning, 10.0:1 (in accordance with Section 124(c) of the City Planning Code, since both sites are nearer to a C-3 District than to any R District). Under Sections 125(a) and 125(b) of the City Planning Code, both sites would be eligible for corner lot and through (interior) lot premiums; the permitted FAR for both sites would thus be about 12.0:1. The Permanent Controls require Conditional Use (CU) authorization for new construction above a height of 35 ft. (pursuant to Section 132.3. and 254) to allow for sunlight access to Chinatown sidewalks. Blocks north and east of the site are zoned C-2; blocks west of the site are zoned CCB; blocks south of the site are zoned C-3 (Portsmouth Square is zoned P). City Planning Code Use Districts are shown in Figure 16, p. 44.

Both A- and B-Sites are in a 65-D-2 Height and Bulk District, in which the maximum allowable height is 65 ft., and, above 40 ft. in height, the maximum allowable length and diagonal dimensions are 100 and 140 ft., respectively. Heights above 65 ft., to a maximum of 200 ft., in the 65-D-2 Height and Bulk District may be approved by the City Planning Commission as a Conditional Use (CU) is appropriate cases. Immediately south of the project block is a 200-S height and bulk district. City Planning Code Height and Bulk Districts are shown in Figure 16, p. 44.

The first four paragraphs under Zoning, beginning on p. 78 of the EIR are revised as follows, to reflect the new Chinatown Permanent Controls (new language is underlined):

The two sites are in an area where the City has recently adopted permanent zoning controls which change the zoning of the project sites from C-2 (Community Business) to CR/NC (Chinatown Residential/Neighborhood Commercial) for A-Site and to CCB (Chinatown Community Business) for B-Site. The Chinatown Permanent Controls require Conditional Use (CU) authorization for new buildings with heights above 35 ft. to allow for sunlight access to Chinatown sidewalks (Section 254). The project, at about 165 ft. to the top of the highest occupied level (not including the 14th mechanical level or the mechanical penthouse - an additional 30 ft.) on A-Site, and about 94 ft. (not including the six-ft.-tall mechanical penthouse) on B-Site, would require CU authorization. The basic Floor Area Ratio (FAR) for the CR/NC District is 1.0:1; the FAR for the CCB District is 2.8:1. These FAR limits would not apply to the proposed project, in accordance with Section 124.1(a) of the Chinatown Permanent Controls which provides that developments with a commitment of Community Development Block Grant (CDBG) funds as of January 10, 1985 for creation of new housing can be developed under the FAR of the underlying zoning. The permitted FAR for both sites is about 12.0:1, including corner and interior lot premiums. The FAR proposed for the project on A-Site would be about 9.7:1 (including residential use and non-accessory parking in the floor area calculation); the FAR proposed for the project on B-Site would be about 7.01.

The project would exceed the 65 ft. height limit of the 65-D-2 Height and Bulk District and would require CU authorization to exceed 65 ft.; height up to 200 ft. may be permitted (pursuant to Section 263.1 of the City Planning

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Code). The project has been designed to conform to height restrictions (but not bulk; a Special Exception would be sought from the bulk requirements for both structures as provided for in Section 271 of the City Planning Code) of the 65-D-2 district. As stated earlier, Chinatown Permanent Controls require CU authorization for buildings exceeding 35 ft. in height.

Under the permanent controls, which govern the residential density allowable on the site, the permitted dwelling unit density is one for each 200 sq. ft. of lot area (City Planning Code Section 207.5). Thus, A-Site would be allowed 94 units. The Code further provides, under Section 209.1(m) that dwellings specifically designed for, or occupied by senior citizens or physically handicapped persons (units must be limited to such occupancy for the lifetime of the buildings) may be allowed at a density not exceeding twice the number of units otherwise permitted. Residential units within the project are specifically designed for senior citizens (17.5% of the tenants residing in the tower would have units meeting handicapped requirements). The 120 units proposed would be fewer than the 188 units permitted.

The first full paragraph on p. 80 of the EIR is revised to read as follows (new language is underlined):

The project would not meet the Planning Code site coverage requirement for Chinatown Mixed Use Districts (Section 134.1). In Mixed Use Districts, at the lowest story occupied as a dwelling, the site coverage allowed is no more than 75%. The non-covered area requirement may be provided in a location other than a rear yard, including roof top terraces and balconies. The project sponsor would seek a variance from this requirement. Both project buildings would require exception from bulk requirements (in accordance with Planning Code Section 271).

REQUIRED APPROVALS

Comment

"Which sections of the Downtown Plan apply to the proposed project? Show how these requirements will be met, if applicable." (Chinatown Resource Center)

"The two office towers would violate existing zoning ordinances and height restrictions." (Howard Ellman)

"Already, the fringes cast menacing shadows on its borders, but Kearny Street between Clay and Pacific has at least been functioning as a 'wall' against this, because of the

interim controls. Now, you talk about 'variance this' and 'exception that', so that you can finish off the high wall of shadow around Chinatown, clearing [sic] marking the limits of our community. Creating a 'reservation' type compound within which we must stay. Your new plan for Chinatown stinks and basically you're saying that without going outside of the law, the project cannot be built." (Don Chan)

Response

- The project sponsor is not proposing to proceed with the project outside the law. The sponsor is requesting allowable exceptions which may be authorized by the City Planning Commission under the Conditional Use and Planned Unit Development process. Under the Chinatown Permanent Controls, the project sponsor would request Conditional Use (CU) authorization for the following exceptions, which concern the scale of the project and ways to insure compatibility with adjacent buildings, uses, and the environment. The following reviews would be required for both the project and for Alternative G.

Section 121.4: A-Site would be subject to this section which specifies that individual commercial uses in Chinatown Residential/Neighborhood Commercial Districts have a Use Size Limit of 2,500 sq. ft. per use, in order to protect and maintain the small scale of commercial uses in the area. The maximum size allowed for individual uses in this district is 4,000 sq. ft. There is no maximum requirement in the Chinatown Community Business use district, so B-Site would not be subject to this requirement.

Section 121.3: In order to protect the scale of development in Mixed Use Districts, any development on lots larger than 5,000 sq. ft. is subject to review under the CU process. Both A- and B-Sites exceed the 5,000 sq. ft. Lot Size Limit and would be subject to CU review under this section.

Section 132.3 and 254: Both of these sections regulate sun access to Chinatown sidewalks. All proposed buildings and structures exceeding a height of 35 feet in Chinatown Mixed Use Districts are subject to CU approval (Sec. 254). Section 132.3 specifies setback requirements for specific streets in Chinatown to insure sun access to sidewalks. Along Kearny Street, the setback requirement is a 15-ft. setback beginning at a building height of 52 ft. Along Washington Street a 15- ft. setback

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beginning at a building height of 47 feet is required. There are no setback requirements specified for Jackson Street or Columbus Avenue. Exceptions to these requirements can be authorized through the CU process. Neither the DEIR project nor Alternative G would include these setbacks.

Section 145.3: In the Chinatown Mixed Use Districts, proposed buildings and structures' street frontages are limited to 50 feet; street frontage exceptions may be approved under the CU process. Criteria for exceptions include use of such treatments as varied windows and entries, textures, colors and individual storefronts to make the building appear as more than one building; bay windows or vertical recesses may be used also. Both A- and B-Site buildings would be subject to this Section as they exceed the 50 foot limit on Washington, Jackson and Kearny Streets and Columbus Avenue.

Section 157: The project (and Alternative G) would contain parking in excess of the amount classified as accessory parking; therefore, CU authorization for the excess parking would be required, and/or finding that the off-street parking is adequate for the occupancy proposed under Section 304, Planned Unit Development provisions.

Section 263.1: Special exception to the 65 foot height limit of the 65-D-2 Height and Bulk District is allowed, up to but not to exceed 200 feet, provided that the exception meets the following criteria: 1) the exceeded height provides a stepping down of height from the Downtown Office District; 2) the structure avoids excessive bulk which could effect views, sidewalk sun access or other pedestrian amenities; and 3) the structure respects the historical and architectural character of the area. The City Planning Commission would consider the project's request for a height exception based on the above criteria.

Section 271: Under Section 270, Bulk Limits, the allowable bulk measurements in the 65-D-2 height and bulk district above a height of 40 ft., are a maximum length of 110 ft. and a maximum diagonal dimension of 140 ft.; the DEIR project and Alternative G, would exceed these limits on both A-Site and B-Site and thus require an exception. Section 271 specifies that certain exceptions to bulk limits are allowed, if they meet certain criteria which include that the additional bulk would

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achieve a distinctly better design, both in a public and private sense, or that the proposed use has widespread public benefits and requires the additional bulk for functional reasons.

In addition to these reviews, the project (but not Alternative G) would require a variance from the requirement in Section 134.1 that site coverage at residential floors be no more than 75%.

Section 304: Planned Unit Development. Due to its size, which exceeds one-half acre, and its design as one project, Alternative G may be processed as a Planned Unit Development allowing modification of code provisions and grouping of the previously described Conditional Use requirements.

Comment

"p. 37. There was a request to double check that the project is exempt from the '321' competition but that its office square footage counts against the office growth limit."
(Rolland Lowe, CAC)

"Will Commission review include advice from an architectural review panel?" (Chinatown Resource Center)

Response

The Pan Magna plaza project is exempt from review under City Planning Code Section 321 (under Section 320(g)5 -- as renumbered by Proposition M) because the project would receive Community Development Block Grant Funds for housing units affordable to low-income households for a minimum of 40 years, and because applications for environmental review and site permit were filed prior to the effective date of the ordinance implementing the Downtown Plan. However, in accordance with Section 321(a) 2D, the office area in the project would be deducted from the annual office cap.

It is presumed that the commenter is referring to the architectural review which is part of the Section 321 review process of office buildings of 25,000 gsf or more. As stated above, the project is exempt from review under Section 321 of the City

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Planning Code. Architectural review and critique of the project has been provided by the Planning Department staff.

The first full paragraph on p. 37 of the EIR is revised as follows (new language is underlined):

The proposed project is exempt from the provisions of Section 321 et seq. of the City Planning Code growth limitation provisions (Section 320(g)(5)). However, the square footage of additional office space approved by the Commission would be counted against the annual limit of 950,000 sq. ft. (475,000 sq. ft. of new office space until the total amount of space approved since November 29, 1984, is reduced to zero in annual increments of 475,000 sq. ft.).

MASTER PLAN

Comments

"The two office towers would violate at least 5 'Objectives' and 11 'Policies' of the Master Plan.

"Since the two office towers would be located outside the C-3 downtown financial district and within Chinatown, they would violate a number of policies in the Downtown Plan (the 'DTP') and in the Chinatown Rezoning Study (the 'CRS'). Both expressly provide that Chinatown should not be an expansion area for downtown development.

"Conflicts With Master Plan. The State Guidelines require that the DEIR fully and adequately discuss conflicts between the proposed project and the Master Plan. The DEIR fails to do so. As a result, it materially misleads the public. Specifically, the proposal cannot be reconciled with the key land use policies and the philosophy of the Downtown Plan.1/

"Specific downtown plan policies with which the proposal conflicts include, among others, the following:

"(a) Confinement Of Commercial Office Space Growth Within The Existing Boundaries Of The C-3-0 District. The Downtown Plan is based on the principle that the pedestrian scale of the downtown office area should be maintained. This fundamental policy directly

conflicts with a proposal to expand commercial office uses to the north of Washington Street. The DEIR at page 45 notes that the project would result in such an expansion but fails to mention there or elsewhere the direct conflict between such expansion and the Downtown Plan.^{2/}

"(b) Orientation of Growth South Of Market. One major purpose of the Downtown Plan is to orient growth in the C-3-0 District to the area south of Market. The C-3-0 Special Districts were created for that express purpose. The Department of City Planning has emphasized this objective in its analysis of the projects being considered for approval in the First Review Period. The Department's report on that subject (dated May 20, 1986) at page 41 states that a major goal of the Downtown Plan is to shift office development to the C-3-0 (SD) area. The DEIR is inadequate for failure to mention, let alone discuss, the direct conflict between the proposal it studies and this key policy of the Downtown Plan.

"The basic fact is that the proposed project fundamentally conflicts with key policies of the Downtown Plan, which is the most important element of the Master Plan in the part of the City in which the project is located. The project cannot be approved without casting serious doubt upon the validity and integrity of the planning principles which lie at the heart of the Downtown Plan.

"The plain fact is that if the City's Master Plan and land use ordinances mean anything, and if the Department's economic data have any validity, then the proposed project is in the wrong place, has no economic or planning justification whatsoever -- and the DEIR is fatally defective for its failure to inform the Commission and the public to that effect.

"The thrust of our concern really with respect to the inadequacy of the EIR is the failure of the EIR to discuss accurately, as it must, the conflict between the proposed project and fundamental policies of the city's Master Plan. And the state guidelines require that such a discussion be full and fair and complete.

"My concern here is that this EIR does not live up to standards, but, more importantly, it's inconsistent with the treatment that you have given in a number of your other projects, some of which are in litigation. And I guarantee you from experience that this EIR if it's

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approved in its current form will be held up on judicial notice in some other lawsuit as an indication to the court that the EIR process in this city varies from project to project simply to justify what has been decided to be done.

"The one material loss that the city has suffered on an EIR case recently was where such inconsistencies exist.

"For those reasons, we believe that this EIR, and for all the reasons I put in my letter, that this EIR is truly inadequate, primarily in its description of how the project fits with the city's planning policies.

"1/ The project site, of course, does not lie within the area encompassed within the Downtown Plan. It is directly adjacent to that area, however. Gov't Code § 65300.5 requires that general plans be internally consistent. That provision prevents the City from approving a project directly contrary to basic plan policies embodied in the Downtown Plan.

"2/ At page 47, the DEIR notes the visual contrast between the C-3-0 District and the area north of Washington Street while failing to note that the proposed project will destroy that contrast." (Howard Ellman)

Response

The relationship of the proposed project to applicable Master Plan Policies is discussed on pp. 40 to 42 of the EIR. Table 3, pp. 82 to 84 of the EIR presents the project's relationship to applicable urban design policies of the Master Plan. Page 101 of the EIR includes a description of Objectives and Policies concerning Architectural Resources. The commenter does not state which five objectives and 11 Policies of the Master Plan which he considers the project would violate.

The Downtown Plan covers the C-3 district. The project site is not within the C-3 district, although the northern boundary of the C-3-0 Use District is at Washington Street adjacent to the project site. Thus, Objectives and Policies of the Downtown Plan are not applicable to the project sites.

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The Chinatown Plan approved by the Planning Commission on February 19, 1987 (Resolution 10929) contains Objectives and Policies applicable to the proposed project. The following paragraphs are added to the EIR, following the last paragraph on p. 42:

Objectives and Policies of the Chinatown Plan, a part of the Master Plan apply to the project. The City Planning Commission will consider the project in the context of these Objectives and Policies, as did the Board of Supervisors and Mayor in their consideration of new zoning regulations. Objective 1 states, "preserve the distinctive urban character, physical environment and cultural heritage of Chinatown." Policy 1 of Objective 1 states, "maintain the low-rise scale of Chinatown's buildings." The project would include heights up to 200 feet. This could be permitted with Conditional Use Authorization in the 65-D-2 height and bulk district.

Objective 3 of the Chinatown Plan, states, "stabilize and where possible increase the supply of housing." Policies 1 and 2 of this Objective state, respectively, "Conserve existing housing," and, "Increase the supply of housing." The project would occupy a site (A-Site) where housing was located prior to 1979. The project would provide 120 housing units on A-Site. All of these units would be specifically designed for and occupied by senior citizens and the physically handicapped.

Objective 4, states, "Preserve the urban role of Chinatown as a residential neighborhood," and Policy 1 of Objective 4 states, "Protect and enhance neighborhood-serving character of commercial uses in predominantly residential areas." The project would provide about 21,600 gsf of retail space, which would be intended for neighborhood-serving retail and restaurant uses.

Policy 2 of Objective 4, states, "Promote a building form that harmonizes with the scale of existing buildings and width of Chinatown's streets." Supporting text for that Policy, includes recommended urban design guidelines, such as a maximum width along street frontage of 50 ft. to 75 ft. for buildings over 40 ft. in height; and where projects are more than 50 ft. in width along the street, street frontage should be divided in architectural treatment to appear as independent buildings. The project frontage along Kearny Street would be about 175 ft. wide (A-Site); the project frontage along Columbus Avenue would be about 216 ft. Buildings on both A-Site and B-Site would incorporate design features such as architectural base elements, and setbacks intended to reduce the appearance of bulk. However, the project structures would exceed the 50 ft. to 75 ft. frontage width along Kearny Street and along Columbus Avenue.

The City Planning Commission in deciding whether or not to approve the project or one of its alternatives will determine whether or not the project is consistent with all applicable objectives and policies of the Master Plan.

URBAN DESIGN

SCALE

Comment

"Pages 82 to 84 of the EIR relate the project to the city's urban design plan policies. Objective 1 Policy 3 says: Recognize that buildings when seen together produce a total effect that characterizes the city and its districts. The EIR admits the project would alter the small scale and character of the neighborhood. It says: The intersection of Columbus Avenue and Montgomery and Washington Streets is important to the perception of the city pattern as a point of orientation. This building would destroy that.

"Objective 3, Policy 2 says: Avoid extreme contrasts in color, shape and other characteristics which will cause new buildings to stand out in excess of their public importance. How does this 200 foot domed mosque, or synagogue, fit into the Chinatown neighborhood?" (Jane Winslow, THD)

"On the issue of scale, I think probably the figure on Page 21, this drawing of the project, shows graphically how out of scale it is. But I think what this EIR needs and lacks and was helpful in the Fifth and Market EIR is something similar to what you have on Page 41, which is the existing land uses. What we need in the Final EIR is this map with each building identified with the number of stories it is. This existed in the Fifth and Market EIR, I believe on Page 42. We would like to cover the same blocks as in this graphic on page 41, which are Assessor's Blocks 175, 176, 177, 194, 195, 196, 207, 208, and 209. I think if you had that map in front of you, you would see just how out of scale this project is. You'd see a neighborhood of three-, four- and five-story buildings, not 195-foot buildings.

"Scale. The 195 foot office tower on Kearny Street is grossly out of scale with the surrounding neighborhood. The Final EIR should include a height map similar to the height map on page 42 of the Final EIR for Fifth and Market and covering the same area as the existing land use map on page 41 of this DEIR (Assessor's blocks 175, 176, 177, 194, 195, 196, 207, 208, 209). Such a map would make this point quite graphically." (Bradford Paul, NOMPC)

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"A map showing the height of existing buildings in the vicinity of the project is necessary to evaluate the impact of the height limit exceptions being proposed by the project."
(Mark Ryser, Heritage)

"The Draft EIR describes an office tower which is very much out of scale with its neighboring buildings in Chinatown. This building is the one which troubles us the most. In fact, the Planning Department's papers shows that the Kearny Street office tower is six times the heights of buildings on Jackson, Washington, and Kearny Street. While neither proposed office tower appears to violate Proposition K, we are concerned about the effects on Chinatown's light, air, scale and traffic of a 196 tower on Kearny Street."
(Cynthia Joe, Chinatown Resource Center)

"The Draft EIR, on page 5 says, 'The proposed office tower on A Site would be about three times the height of prevailing development on the project block and, in general, throughout the North Beach, Chinatown, and Jackson Square districts. According to the Department of City Planning's Chinatown Issue Paper #5, median heights on Washington Street are 28 feet, on Jackson, 36 feet, and on Kearny, 30 feet. DEIR should reflect that proposed 196 feet tower is, in fact, six times the height of prevailing development in these areas. Correct on pages 5 and 80.

"This scale [of the project] would appear to conflict with Master Plan sections quoted on pages 82-84 of the DEIR:

"Objective 1, Policy 5: 'Emphasize the special nature of each district through distinctive landscaping and other features.' DEIR states that the projects would be similar to some North Beach structures. Please list these structures.

"Objective 3, Policy 1: 'Promote harmony in the visual relationships and transitions between new and older buildings. New buildings should be made sympathetic to the scale, form, and proportion of older development.'

"Objective 3, Policy 5: 'Relate the height of buildings to important attributes of the city pattern and to the height and character of existing development.'

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"Objective 3, Policy 6: 'Relate the bulk of buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction.'

"A 196' building is not 'transitional' when surrounded by 3 and 4 story structures. Note that the AIA urban design plan for Kearny Street proposes heights of 50'-120' to preserve existing scale.

"Conditional Use approval requires a finding that this project, '... (2) avoid(s) excessive bulk, intrusiveness, or a continuous wall of buildings that would adversely affect views, penetration of sunlight, or pedestrian amenity in Jackson Square or in any other area.' Please show how the 196 foot tower meets this test.

"Page 80: 'The base element of the proposed A Site structure would relate to existing smaller-scaled structures across Kearny Street from the project site.' Explain."
(Chinatown Resource Center)

"When Urban Design Plan policies are discussed (pp. 82-84), some relevant policies are included and other relevant ones are excluded. At a minimum, Objectives 2 and 7 need to be discussed." (Mark Ryser, Heritage)

"The EIR says the development 'could affect the scale and character of the surrounding neighborhoods.' Especially when the project is taken in the context of other mid- and high-rise development already in place, this statement seems like a considerable understatement. The line of huge buildings along the south side of Washington Street should stand as a monument to the errors of downtown overdevelopment, unrelieved by a transitional 'stepping down' into North Beach. The zoning of the block in question for tall and bulky development violates the integrity of the North Beach/Jackson Square area.

"The EIR fails to weight significantly the importance of architecturally distinctive low-rise buildings to the feeling that these neighborhoods create. Approaching the Columbus/Washington/Montgomery intersection from Montgomery Street especially gives the sense that you have left downtown behind and are entering a human-scale neighborhood. I recognize that this kind of impression is difficult to convey in the dry technical writing of an EIR, but it is extraordinarily important to the surviving character of the city." (John A. Knox)

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"The two office towers would be out of scale with surrounding development in Chinatown, North Beach and, particularly, the Jackson Square Historical District." (Howard Ellman)

"Please show sky plane analysis from mid block on Kearny between Jackson and Washington rather than from one half block from proposed tower. Montages are deceptive. Show scale from across the street in front of the project site." (Chinatown Resource Center)

Response

Commenters opinions are acknowledged. The project and its relationship to surrounding development is discussed on pp. 80 to 84 of the EIR and illustrated in the photomontages on pp. 85 to 91.

To illustrate the scale of the existing development, Figure 17A, p. 224, showing building heights the project vicinity is added to the EIR to follow p. 47. As stated in the first full paragraph on p. 47 of the EIR, there is a contrast of scale between buildings south of the project block and those to the north. On p. 47, the following is added at the end of the sentence which constitutes the first full paragraph: "(see Figure 17A)."

The scale of the project would be less than some high-rises south along Kearny Street, but would be greater than existing development to the north. The tower on A-Site would range between three and six times taller than existing development to the east, north and west. On p. 5 of the EIR, in the second to the last sentence, and on p. 80, in the second sentence of the last paragraph, the words, "three times" are changed to reads "three to six times."

The building on B-Site (proposed for 94 ft.) would contain similar uses to other structures in the vicinity, such as the Old Transamerica Building (50 ft.) and Columbus Tower (95 ft.). Through the use of cornices and other facade detailing, the project is intended to reflect design elements of buildings in the vicinity.

On p. 83, the EIR discusses the relationship of the project to Objective 3, Policy 1 of the Master Plan Urban Design Element. The City Planning Commission will decide whether the scale of the project would be compatible with the existing development.

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Discussion appears on p. 84 about the project's relationship to attributes and character of development in San Francisco. The City Planning Commission in their deliberations on the project will determine the project's conformance with the Master Plan.

The office buildings on A- and B-Sites would be taller than buildings to the north, east and west and shorter than those to the south, as described in the EIR. The EIR does not describe the buildings as "transitional". The City Planning Commission would determine whether the project meets the requirements for Conditional Use authorization.

The base element of the building on A-Site would be similar to heights of development along Kearny Street. The height of this base element would offer a visual continuity with smaller low-rise buildings, and continue to provide a pedestrian-scale, which now exists along Kearny Street.

Objective 2 of the Urban Design Element is the "Conservation of resources which provide a sense of nature, continuity with the past, and freedom from overcrowding." It is included on p. 101 of the EIR in the section "Historical, Architectural and Cultural Resources." The following is inserted on p. 84 of the EIR after Objective 3, Policy 6:

Objective 2, Policy 6 - Respect the character of older development nearby in the design of new buildings.

The base element of the building on A-Site would be of a similar scale to existing low-scale development in Chinatown. The office tower on A-Site would be eight to ten times taller than existing low-scale development in Chinatown. The building on B-Site would use facade detailing and cornice lines to relate the new construction to existing development in Jackson Square.

Objective 2, Policy 7 - Renovation and restoration of older, well designed buildings can preserve the character and interest of the streetscape if the original building design is respected in use of materials and details.

The project would not respond to this policy; the project does not include renovation or restoration of a building - the Colombo Building, rated "3" in the 1976 DCP Architectural Inventory, and B* in the Heritage extended survey, would be demolished.

Objective 7 of the Urban Design Plan does not exist.

Discussion of the effect of the proposed development on the existing architectural resources in the project vicinity appears on p. 78 and pp. 80-84 of the EIR.

The sky plane analysis is used to indicate project shadows and sky plane exposure at a particular point. The point chosen on Kearny Street near Portsmouth Square would be shaded by the project during some summer mornings. Photomontages, although somewhat distorted, are a more representative picture of what the project scale would look like. Photomontages of the project are shown on pp. 85 to 91 of the EIR.

Photomontages of Alternative G, the sponsor's preferred plan are shown on pp. 377 to 378.

VIEWS

Comment

"For 30 years, the Telegraph Hill dwellers have successfully worked to keep Telegraph Hill visible rather than buried by tall development. Nob Hill was once a visible hill, but taller development at its base has flattened it in the city's silhouette. Telegraph Hill is still a visible hill because the Jackson Square blocks where the site sits, the Golden Gateway Housing and other blocks have been consciously held within low height restrictions. These same height restrictions must be maintained at the International Hotel site." (Jane Winslow, THD)

Response

The comment is noted. The City Planning Commission could approve Alternative D, 40-Foot Code Conforming Alternative (No CU), which would provide for development of the two project sites with 40-foot buildings. This would continue the low-scale nature of some of the buildings to the north and east and west of the project site.

Comment

"Check other view corridors for impacts on streets adjacent - Jackson from Nob Hill and Kearny from Telegraph Hill." (Toby Rosenblatt, President, City Planning Commission)

Response

During the preparation of the EIR, the project's visibility in views from various locations on Nob Hill and Telegraph Hill was evaluated. Figures 26 and 27 of the EIR, taken down Washington Street and Montgomery Street, respectively, show the views most affected by the project.

Photomontages of Alternative G, the sponsor's preferred project, are shown on pp. 377 to 378.

ARCHITECTURAL RESOURCES

Comment

"The California Heritage Council is very concerned about the proposed destruction of the Colombo Building (at the northwest corner of Washington, Columbus, and Montgomery [S]treets, or site 'B' of the proposed Pan Magna Plaza).

"This location is one of the historically most significant in San Francisco. It was the heart of Yerba Buena as well as of Gold Rush-era San Francisco. On it were located 'Napoleon of the Theatre' Thomas Maguire's Opera House, the Exchange Saloon, birthplace of the Bonanza Big Four, as well as A. P. Giannini's Bank of Italy, later Bank of America.

"The building itself is important as having been built by Mrs. Drexler, regarded as a leading pioneer feminine entrepreneur, and designed by the Reid Brothers, major turn-of[-]the-century San Francisco architects, whose credits include among others the Fitzhugh Building, now lamentably destroyed.

"The Colombo Building was the major office building erected in post-earthquake-and- fire North Beach. Architecturally it forms a unity with the old Transamerica Building across

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Columbus Avenue and the old Italian Consulate across Montgomery Street. The Colombo Building is a tangible reminder of the time when this intersection was the "heart" and capital of the Italian or Latin Quarter. Later also it became the heart of San Francisco's Bohemian writers' and artists' quarter.

"In light of the fact that the City is presently working on plans to establish both a North Beach Historical District and a Chinatown Historical District, and in light of the historical and architectural significance of the Colombo Building, situated near the confluence of both areas, the California Heritage Council strongly urges postponing any action on this matter until the overall civic policy for this area has been perfected." (Neil Malloch and Herbert J. Konkoff, M.D., CHC)

Response

The information given by the commenters is noted.

Comment

"The Chinatown Survey as discussed in Appendix C reads as if it is the Department of City Planning survey. Why is the Landmarks Board proposal regarding Chinatown not also discussed. If it is included, the relationship between these two needs to be clarified." (Mark Ryser, Heritage)

Response

Appendix C, the following new paragraph is added to the bottom of p. A-44b.

A proposal for a Chinatown Historic District was prepared by Patrick McGrew, President of the Landmarks Preservation Advisory Board, in September 1985, and was approved by the LPAB; the proposal is currently before the City Planning Commission. The proposal suggests district boundaries, and includes a statement of significance and ratings of compatibility for individual structures. Factors considered were: materials, details, scale proportion, color, facade treatment and fenestration. Harmony with the surrounding buildings and the district was also weighed. Most of the buildings in the survey area were deemed compatible.

Comment

"Does the map on page 54 include all architecturally and historically significant buildings from the Department of City Planning survey, City Landmark list, and all Chinatown surveys? Why does this map not appear to reflect the San Francisco Heritage survey? Ratings of Heritage's survey should be reflected to allow an adequate assessment. In addition, with respect to the Jackson Square Historic District as shown on this map, the fact and reason that some buildings were designated historical landmarks and other equally magnificent structures were not, needs to be acknowledged and explained.

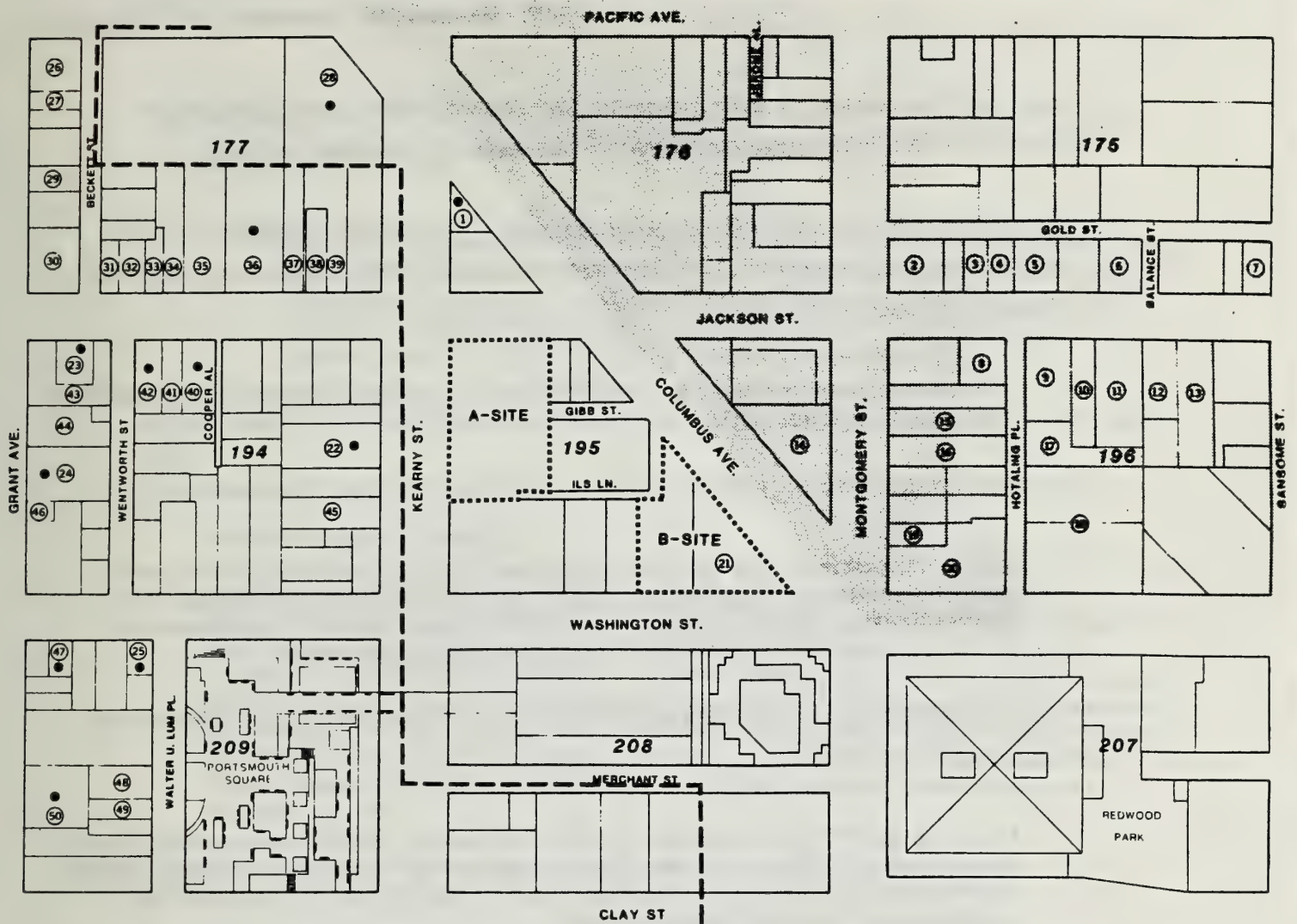
"A discussion of the height, ages, architectural styles of these surrounding buildings is also needed to better assess the contextural character of the proposed project.

"Definition of various survey ratings is not adequately defined. The Heritage rating of B* mentioned on page 53 (as well as page 6) should be explained. In addition, Appendix C does not define the criteria for the North Beach Historical Survey findings. This would be helpful, particularly in understanding the difference between the 'A' rating in the North Beach Survey and the B* of Heritage." (Mark Ryser, Heritage)

Response

Figure 20, Architecturally Significant Buildings in Project Vicinity, p. 230 is revised to include the 1985 extended Heritage survey. Figure 20 shows City Landmarks, buildings rated 3 or above in the Department of City Planning city-wide survey and buildings rated in the extended Heritage survey; all three of these surveys included the project site.

Jackson Square was surveyed by the Department of City Planning in 1970. The survey is on file and available for public review at the Department of City Planning, 4th Floor, 450 McAllister Street, San Francisco. The site is not within the Jackson Square Historical District. The District, as well as individual landmarks within it, were designated by the appropriate agencies pursuant to the appropriate City Planning Code provisions. Although the commentor may not agree with the actions



	LANDMARK NO. AND EFFECTIVE DATE		S.F. DCP INVENTORY	HERITAGE	
1. COLUMBUS TOWER (SENTINEL BLDG.)	33	6/70	5	A	26. 1056-66 GRANT AVE.
2. 800-804 MONTGOMERY ST.	26	3/70	4		27. 1050 GRANT AVE.
3. 470 JACKSON ST.	22	3/70			28. 935-51 KEARNY ST.
4. 472 JACKSON ST.	23	3/70	4		29. 1024-26 GRANT AVE.
5. 458-60 JACKSON ST.	25	3/70			30. 1000-22 GRANT AVE.
6. 432 JACKSON ST.	24	3/70	3		31. 670 JACKSON ST.
7. 400 JACKSON ST.	27	3/70	2		32. 862 JACKSON ST.
8. 473 JACKSON ST.	20	3/89	5		33. 656 JACKSON ST.
9. 451 JACKSON ST.	12	2/89	5		34. 650 JACKSON ST.
10. 445 JACKSON ST.	13	2/89	5		35. 640 JACKSON ST.
11. 441 JACKSON ST.	14	2/69	4		36. 626-36 JACKSON ST.
12. 415-31 JACKSON ST.	15	2/69	4		37. 622 JACKSON ST.
13. 407 JACKSON ST.	16	2/69	1		38. 614 JACKSON ST.
14. TRANSAMERICA BLDG. (4 COLUMBUS AVE.)	52	3/73	4		39. 608 JACKSON ST.
15. 728-30 MONTGOMERY ST.	10	2/69	3		40. 645-49 JACKSON ST.
16. BELLI BLDG. (722 MONTGOMERY ST.)	9	2/89	4		41. 655-57 JACKSON ST.
17. 32-42 HOTALING PL.	11	2/69	5		42. 661-65 JACKSON ST.
18. 580 WASHINGTON ST.			3		43. 952-66 GRANT AVE.
19. 710 MONTGOMERY ST.			3		44. 940-50 GRANT AVE.
20. 700 MONTGOMERY ST.			3		45. 825 KEARNY ST.
21. COLOMBO BLDG. (1 COLUMBUS AVE.)			3	B	46. 918-20 GRANT AVE.
22. 833 KEARNY ST.			3	B	47. 743 WASHINGTON ST.
23. 675 JACKSON ST.			3		48. 21 WALTER LUM (BRENHAM) PL.
24. 930 GRANT AVE.			3	B	49. 17-19 WALTER LUM (BRENHAM) PL.
25. 743 WASHINGTON ST.			3	C	50. 824-32 GRANT AVE.

HERITAGE



JACKSON SQUARE HISTORIC DISTRICT
STRUCTURES ON THE LIST OF
SIGNIFICANT BUILDINGS IN CHINATOWN
(1985 CHINATOWN SURVEY)



BOUNDARY OF PROPOSED CHINATOWN
HISTORIC DISTRICT

207

BLOCK NUMBER

NOTE: See Appendix C for a discussion
of surveys and rating.



0 FEET 300

FIGURE 20
ARCHITECTURALLY SIGNIFICANT BUILDINGS
IN PROJECT VICINITY

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taken by these agencies, a discussion of how those decisions were made is not relevant to the environmental review of the currently proposed project.

The fourth sentence of the first paragraph on p. 53 is moved to become the third sentence of that paragraph; the following sentence is added to the end of the first paragraph on p. 53:

The district was approved by the LPAB and is currently pending before the City Planning Commission.

The second paragraph on p. 53 is revised to read (new language is underlined):

Figure 20 indicates the designated Jackson Square Historical District, and identifies those buildings in the project area which are City landmarks and those buildings rated 3 or above in the 1976 Department of City Planning Architectural Inventory, or in the expanded Heritage Survey.

The last sentence in the third paragraph on p. 53 is revised to read as follows (new language is underlined):

It was rated B* by Heritage in its extended survey. The B* rating was given to the Colombo Building because of the alterations to the structure which affects its integrity; B* means if these alterations were reversed or removed the building would be rated A by Heritage.

The following is added after the first sentence on p. A-44c of the EIR:

In some instances Heritage has added a * designation to certain letter ratings (B* for example). The * designation means one of two things, either that if alterations which were made to the building were reversed or removed, the building would be rated higher by Heritage; or if additional information on the building or architect becomes available, then the building would receive a higher rating.

The following is added to the end of the third paragraph on p. 53:

The North Beach Historical Survey identified the Colombo Building as an important visual and historical landmark when considered with the old Transamerica building across the street (the North Beach survey did not rank structures with a letter or number system rather, it discusses and describes the building of North Beach qualitatively). According to the survey, the Colombo building along with the Old Transamerica building serve as the gateway to Columbus Avenue and North Beach; the Colombo building is a major contribution in defining the intersection which serves as a transition point to North Beach, Jackson Square, the Financial District and Chinatown.

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The following note is added to p. 57 of the EIR (the numbers of the other footnotes are changed accordingly):

- /1/ Jean Kortum, Member of the Landmark Preservation Advisory Board, past director of the North Beach Historical Project Inc. which prepared North Beach San Francisco: An Architectural, Historical, and Cultural Survey, June 30, 1982, and Anne Bloomfield, co-author of the North Beach Survey, June 30, 1982, telephone conversations, April 20, 1987.

In Appendix C, the following new paragraph is added to the bottom of p. A-44c of the EIR.

NORTH BEACH SURVEY

"North Beach San Francisco: An Architectural, Historical, and Cultural Survey," was prepared by Anne Bloomfield, Daniel Warner and Nancy Olmsted and was sponsored by the North Beach Historical Project, Inc. The survey included a visual survey by foot of 1,100 buildings in North Beach, definition of North Beach as opposed to Russian or Telegraph Hills and an historical account of the both the area and certain structures. This survey did not rank individual structures with a letter or number system; rather it discusses and describes North Beach buildings qualitatively in their architectural, historical and cultural context.

Comments

"Page 37, Paragraph 3. Please discuss the status of this Board's recommendation for landmark designation, specifically in terms of the applicability of Section 1006 of the City Planning Code regarding Certificate of Appropriateness review for demolition of the Colombo Building.

"Page 38, Paragraph 1. The paragraph is somewhat unclear. The boundary of Jackson Square is readily defined by its historic district designation.

"Page 38. Note that Jackson Square is a designated historic district.

"Page 42, Paragraph 3. Insert Objective 2, Policy 4 regarding preservation of notable landmarks, and the relation of this project thereto.

"Page 45, Paragraph 1. Addition of the Assessor's Block number after 'The project block...' would clarify this paragraph.

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"Page 45, Paragraph 2. Note that the Transamerica Building is designated landmark number 52.

"Page 45, Paragraph 5. Note that the Colombo Building marks the traditional beginning of the North Beach district.

"Page 56, Paragraph 2, Sentence 3. Clarify by revising as follows:

'By 1848, the block was an integral component of the center of San Francisco.'

"Page 101, Paragraph 5. Significant cultural resources may be uncovered from periods post-dating the Gold Rush era.

"Page A-44, Paragraph 5. Substitute a discussion of the Downtown Plan preservation policies for the description of the now outdated List of Significant Buildings in the Downtown." (Jonathan Malone, LPAB)

Responses

The Colombo Building is not a designated landmark. As stated on p. 53 of the EIR, in the third paragraph, the Landmarks Preservation Advisory Board recommended the Colombo Building for City Landmark status; the Planning Commission tabled action on this recommendation in June 1984. If the Colombo Building were a designated landmark, the sponsor would have to apply for a Certificate of Appropriateness for construction, alteration, removal, or demolition of a structure on a landmark site. The application would be reviewed by the Department of City Planning with the advice of the LPAB (City Planning Code Section 1006).

On p. 38, in the first paragraph, the EIR discusses land use in the project vicinity. The commenter is correct that Jackson Square is defined by its historic district boundaries. However, similar character, scale, and uses of buildings can be found in all three districts, and the boundary of Jackson Square is not readily discernible to an observer. In contrast, the Financial District is readily identified by its highrise structures.

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The following sentence is added to p. 38 at the end of the third paragraph:

Jackson Square is a National Register Historic District.

Objective 2, Policy 4 of the Urban Design Element is to "Preserve notable landmarks and areas of historic, architectural or aesthetic value, and promote the preservation of other buildings and features that provide continuity with past development." This policy is discussed in the second paragraph on p. 101 of the EIR.

The following is added to the EIR as the last paragraph on p. 42:

Objectives and Policies of the Urban Design Element are discussed on pp. 82 to 84; Objectives and Policies of the Urban Design Element relating to Architectural Resources are discussed on p. 101.

The beginning of the first sentence of the first paragraph on p. 45 is revised to read (new language is underlined):

The project block, Assessor's Block 195, is bounded by . . .

The second sentence, in the second paragraph on p. 45 is revised to read (new language is underlined):

Of note is . . . Transamerica Building, City Landmark No. 52, on the east side of Columbus Avenue.

The following sentence is added to end of the first (partial) paragraph on p. 47 of the EIR:

The Colombo Building, together with the old Transamerica Building have traditionally marked the entrance to the North Beach district.

The last sentence of the first full paragraph on p. 56 of the EIR is revised to read (new language is underlined):

By 1848, the block was an integral component of the center of San Francisco.

The second sentence, in the third paragraph on p. 101 of the EIR is revised to read (new language is underlined):

The investigation indicates the potential presence of significant cultural resources on both A - and B-Sites, dating from the Spanish-Mexican, Early American, and Gold Rush periods. There is also evidence that aboriginal remains and cultural remains from more recent periods may be discovered.

On p. A-44, the heading "Architecturally and/or Historically Significant Buildings in the Downtown," and the two paragraphs beneath the heading are deleted and replaced with the following:

DOWNTOWN PLAN CATEGORIES

The Downtown Plan establishes four categories of architecturally important structures. The Plan states (p. 66) "This Plan proposes a preservation strategy that would require that 244 buildings (called significant buildings in this Plan) be retained, while providing incentives to encourage the retention of other important, but less significant buildings (called contributory buildings). They are shown on Map 12. Both classes of buildings would be entitled to 'Transferable development rights.'

The following material, taken from the Plan, describes the categories and briefly identifies preservation strategies.

Significant Buildings

Those buildings of the highest architectural and environmental importance--buildings whose demolition would constitute an irreplaceable loss to the quality and character of downtown--would be required to be retained. There are 244 of these buildings. They include all buildings rated by Heritage as excellent in either architectural quality or relationship to the environment, or very good in both. (This covers all buildings rated "A" by Heritage and most of the buildings rated "B".)

These buildings--referred to in the Plan as significant buildings--are divided into Category I and Category II, the difference being in the extent of alteration allowed There are 202 significant buildings in Category I ([listed] in Appendix A of Article 11 [of the Code] and 42 significant buildings in Category II listed in Appendix B of Article 11 of the Code.

Contributory Buildings

The Downtown Plan proposes to encourage, but not require, retention of other buildings contributing to the quality and character of downtown. these buildings, called contributory buildings, consist of two groups:

Category III

- Buildings rated very good in architectural quality, but lower than very good in relationship to the environment, or vice versa, and located outside conservation districts. (These buildings were rated "B" by Heritage.) There are 20 of these buildings. They are listed in Appendix C of Article 11 of the Code.

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Category IV

- Buildings rated very good in architectural quality, but lower than very good in relationship to the environment or vice versa and which are located in a conservation district. (These buildings were rated "B" by Heritage.)
- Buildings with "contextual value" to a conservation district. These contextual buildings are buildings that themselves are not highly rated in architectural quality and relationship to the environment, but do make a substantial contribution to the "quality" of an area that contains a number of highly rated buildings and that is proposed to be given special protection as a conservation district. (These buildings were rated "C" by Heritage.) The 167 Category IV buildings are listed in Appendix D of Article 11 of the Code.

Six conservation districts are established by the Plan:

Kearny-Market-Mason-Sutter Conservation District

Kearny-Belden Conservation District

New Montgomery-Second Street Conservation District

Commercial-Leidesdorff Conservation District

Front-California Conservation District

Pine-Sansome Conservation District

Generally, the Downtown Plan does not allow transfer of development rights to parcels when such transfer would result in the substantial alteration or demolition of a Significant or Contributory Building.

Comments

"The construction of that use [office on B-Site] will require the demolition of a B-rated building, which is directly contrary to a fundamental policy applicable to the area where such construction is to occur.

"The Columbus Avenue office tower would result in the demolition or degradation of the Colombo Building which has been unanimously recommended for City Landmark status by the members of the Landmarks Preservation Advisory Board. (See letter of June 19, 1985, from H. Grant DeHart, Executive Director, The Foundation For San Francisco's Architectural Heritage.)" (Howard Ellman)

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"I really feel that the Colombo Building itself is being used as a barter chip here in that it's being said that the elderly housing won't be able to fly unless they rip down a building that has been around since at least 1910. It also should be considered a landmark, since it was built by the same guys who built the Fairmont Hotel.

"I am really worried, you know, about future generations, what's happening to San Francisco. Is there going to be any more of the old North Beach accents that people have moved and tourists have come to San Francisco for many years -- what's going to be left?

"This is a building that is not there, you know, or will not be there for your children or your grandchildren, my children, grandchildren to see in the future." (Lisa Huggins)

"Perhaps the dull exterior of the neglected Colombo Building has failed to impress the EIR researchers. I would assert that it preserves an important historic influence at a critically important intersection. It deserves to be kept, even if the prospective developer considers its design inferior to what its architect has in mind and 'an under use of B-site.'" (John A. Knox)

"The Foundation for San Francisco's Architectural Heritage believes that this draft EIR inadequately addresses the impact of the project on the existing structure at Columbus and Washington Streets (the Colombo Building).

"The Colombo Building, as the draft EIR notes, was rated by the Department of City Planning as among the top 2% of the most significant structures in San Francisco. It was rated B* by Heritage and A by the North Beach Survey. It has been recommended for designation as a city landmark by the Landmarks Advisory Board.

"The demolition of a significant building such as the Colombo is a significant effect that cannot be avoided if the project is implemented. This has not been discussed under Chapter VI (p. 160). Similarly, this effect also must be discussed under Chapter VIII (p. 162)." (Mark Ryser, Heritage)

"Page 101. Demolition of the Colombo Building, rated 'B', '3', and recommended by this Board for landmark status, would constitute a significant environmental effect.

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"Page 101, Paragraph 2, Sentence 3. Demolition of the Colombo Building is a significant environmental effect which is not mitigated by the design of the replacement structure."
(LPAB)

Response

The opinions of the commenters are noted. The proposed demolition of the Colombo Building is discussed throughout the EIR, specifically the rating and landmark status of the Colombo Building is discussed on pp. 52, 53 and 55, and 101

Based on the analysis in the EIR, demolition of the Colombo Building was not found to be a significant, unavoidable effect. Final determination is left to the City Planning Commission. Page 160, paragraph one of the DEIR, notes that identification of significant unavoidable environmental effects is "subject to final determination by the City Planning Commission as part of its certification process for the EIR. Chapter IV of the Final EIR will be revised, if necessary, to reflect the findings of the Commission." The City Planning Commission must also find that the project, on balance, is consistent with the eight priority policies contained in Proposition M (see p. 369). One of these policies is the preservation of landmark and historic buildings.

Comments

"Conflict With Historic Preservation Goals. As the DEIR notes, the project will require demolition of a B-rated building. The DEIR is inadequate for failure to make reference to the fact that such activity would not be allowed within the C-3-0 District -- the district where office buildings are supposed to be located. The City has decreed, as a fundamental element of the Master Plan, that historic and architecturally significant buildings should not be replaced by new commercial office uses./1/ The DEIR makes no effort to explain how a matter declared to be a fundamental policy south of Washington Street has no significance on the north side of the street. At a minimum, the DEIR should explain that the use proposed on the Colombo Building site is a C-3-0 type use and a critical policy of the controls now applicable to such uses would preclude demolition of such a building for construction of commercial office space. The public should be

informed that to carry out the project which is the subject of the DEIR, the City will be required to disregard a principle which it has declared to be a critical part of future planning decision.

"/1/ The Colombo Building will be demolished to accommodate office space at a time when the Department of City Planning has determined that office space is not necessary. In its report with respect to buildings under consideration during the first review period, the Department has refused to recommend approval of any of the buildings (including a building to be located in the C-3-0 (SD) District where the Downtown Plan directs that such use is most desirable) because, with vacancy rates approaching 17%, office space is not required. The DEIR is inadequate for failure to state that the office space for the proposed project is not necessary for the same reasons and thus any decision to approve the project would result in construction of unneeded office space at the sacrifice of a significant historic structure and key Downtown Plan policies." (Howard Ellman)

Response

It is not true that demolition of the Colombo Building would not be allowed if it were in the C-3 District. If the Colombo Building were inside the C-3 District and if it were designated as a Significant Building in Article 11 of the City Planning Code (see response on p. C&R 58); then it would be required that the building be retained. The likelihood that the Colombo Building would be designated as a Significant Building cannot be determined. Although rated B* in the Heritage extended survey the Colombo Building was rated '3' in the DCP 1976 survey. Many, but not all, Heritage B-rated buildings were designated Category I. A number of Heritage B-rated buildings were designated Category III or IV.

See responses on pp. 270 to 284 concerning office space and office vacancy rates.

Comment

"The photographs on pp. 46, 48, and 49, are inadequate to show all faces of the Colombo Building and its relationship to the neighboring buildings as well as other surroundings." (Mark Ryser, Heritage)

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Response

The photographs on pp. 46, 48 and 49, illustrate the project sites and their existing context. The photographs on p. 46 shows a short range view of the gore corner that is the Colombo Building. Additional photographs would not convey more information than that already existing in the EIR.

CULTURAL RESOURCES

Comment

"Page 55, 'Historical Setting.' Include references to Manilatown and long history of Philipinos at the site." (Chinatown Resource Center)

Response

The following text is added to the EIR on p. 55, after the fifth paragraph:

Prior to 1979, the I-Hotel provided low-income housing to mostly Asian, particularly Philipino, elderly tenants. The project sites are in an area formerly referred to as "Manilatown" because of the large number of Philipinos who lived in the vicinity. Although there are still some Philipino residents in the area, Manilatown no longer exists as a distinct area.

Comment

"What is the significance of the phrase (on page 151a) regarding archaeological activities '(cumulatively for all instances that the ERO has required a delay in excavation or construction)'?" (Mark Ryser, Heritage)

Response

The paranthetical phrase referred to by the commenter indicates the total amount of time (four weeks) that construction or excavation activities may be delayed by the Environmental Review Officer (ERO) in order to protect cultural resources at the

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site. ERO may not delay excavation or construction activities for more than a total of four weeks during the entire construction period.

Comment

"We request that the County Coroner's office be contacted if human remains of Native American origin are encountered during the project, pursuant to the procedures set forth in Section 7050.5 of the Health and Safety Code. Should this occur, the Commission will assist in expediting the preservation and protection of the remains in a respectful manner." (Annette Ospital, NAHC)

Response

Comment acknowledged. The following text is added to the EIR on p. 151a after the fourth paragraph as a new paragraph and mitigation measure proposed as part of the project:

- Should human remains of Native American origin be encountered during excavation or construction activities, the project sponsor would contact the County Coroner's office, pursuant to the procedures set forth in Section 7050.5 of the Health and Safety Code, to assure preservation and protection of the remains in a respectful manner.

SHADOW

Comment

"Chinatown Rezoning Plan shows that a 200 foot building with setback at 161 feet would permit sun on Kearny Street for 1 1/2 hours at mid-day from March-September (the 'best case' months.) DEIR should reflect this." (Chinatown Resource Center)

Response

Specific shadow impacts of the project (rather than generalized impacts of a 200-ft. building with a set back at 161 ft.) are discussed in detail on pp. 81, 92 and 98, and illustrated on pp. 94 to 96. Specifically, the EIR graphically illustrates project shadow at noon.

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Comment

"The shadow and wind impact discussion should also include an analysis of effects on the proposed roof open space for the housing and its comfort level." (Rolland Lowe, CAC)

"Is the proposed open space on rooftop and in rear courtyard usable? Analyze relative to shadows, sun exposure, light, noise, proposed furnishings." (Toby Rosenblatt, President, City Planning Commission)

Response

With the DEIR project, the rooftop open space would be substantially in shadow from its own tower on the southern portion of the site. Wind walls would be necessary to reduce wind speeds to acceptable levels. The following mitigation measure is added before the Cultural Resources mitigation measures on p. 150 of the EIR:

WIND

The rooftop open space on A-Site would be protected by wind walls. Other wind baffling devices would be included in the project as necessary to reduce winds in the rooftop open space to acceptable levels.

Alternative G, the sponsor's preferred plan, would include the open space on the south side of the tower on A-Site, thus avoiding shadows from the project itself. However, highrise buildings such as the Holiday Inn, the Montgomery Washington Building and the Transamerica Pyramid would result in the rooftop open space being in shadow most mornings year round.

Comment

"The Columbus Avenue tower would violate Proposition K by casting significant shadows on Portsmouth Square, the only significant open space in all of Chinatown. The two office towers could also shadow the Jackson Square Historical District." (Howard Ellman)

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Response

The building on B-Site would not cast new shadow on Portsmouth Square during the times regulated by Proposition K. As stated in the last sentence of the last full paragraph on p. 98 of the EIR, "The project would add no new shadow to Portsmouth Square from one hour after sunrise to one hour before sunset year round." The shadow diagrams on pp. 93 to 96 of the EIR, show shadow impact on the Jackson Square Historic District.

TRANSPORTATION

TRIP GENERATION

Comment

"Page 7, the third and fourth paragraphs describe the number of pedestrian and transit trips that would be generated by the project. Although presented in other portions of the document, this section also should summarize the number of vehicle trips anticipated that would be generated by the project." (Wallace Rothbart, Caltrans)

Response

The following sentence is added to the summary on p. 8 of the EIR as a new second paragraph:

The project would generate about 125 vehicle trip ends during the p.m. peak period, about 80 of these would occur during the p.m. peak hour.

Comment

"p 109 Were elevator service constraints in the proposed office space considered in projecting pedestrian volumes. The volume seemed overconcentrated at peak times." (Rolland Lowe, CAC)

Response

Elevator service constraints were not specifically considered in projecting pedestrian volumes. Elevator service constraints would not impede the pedestrian volumes projected in the EIR. The project is two buildings with a total of five elevators serving office uses, and two elevators serving residential uses. Additionally, many of the pedestrian trips are generated by ground-floor retail uses not requiring elevator service.

Comment

"Certain traffic origin and destination data was collected for the Orangeland Project. Was this data considered in determining the project's impacts on the Chinatown community?" (Michael Louie, TRIP)

Response

As stated on p. 103 of the EIR assignments to travel modes and trip generation was based on modal split data from the Downtown Plan EIR (EE 81.3). This analysis was used for the project EIR as it was assumed that travel behavior from the project would be similar to travel behavior in the C-3 District because of the very close proximity of the site to the C-3 District and the amount of office space included in the project. However, since publication of the Draft EIR, an analysis of travel behavior in the Chinatown area has been conducted which incorporates traffic origin and destination data collected for the Orangeland Project. The following text and Table 4A (not including the Alternative G Chinatown Analysis) are added on pp. 104a to 104b after Table 4 on p. 104 of the EIR:

After publication of the Pan Magna Plaza Draft EIR, the San Francisco Department of City Planning published a document which analyzed transportation behavior in the Chinatown area, Transportation Impact Analysis for the Proposed Chinatown Rezoning Plan, January 1987.

Comparing trip data for the Chinatown Area to that for the C-3 District reveals a higher percentage of people who drive and ride Muni than other modes. Table 4A, below, presents year 2000 modal splits for the project as analyzed in the DEIR using the C-3 District analysis and compares them with

TABLE 4A: COMPARISON OF YEAR 2000 TRAVEL DEMAND FROM PAN MAGNA PLAZA PROJECT USING DOWNTOWN PLAN EIR ANALYSIS AND CHINATOWN ANALYSIS AND YEAR 2000 TRAVEL DEMAND FROM ALTERNATIVE G USING CHINATOWN ANALYSIS

	DEIR Project		DEIR Project		Alternative G	
	Downtown Plan Analysis		Chinatown Analysis		Chinatown Analysis	
	P.M. Peak Period/b/	P.M. Peak Hour/b/	P.M. Peak Period/b/	P.M. Peak Hour/b/	P.M. Peak Period/b/	P.M. Peak Hour/b/
Drive Alone	110	60	240	170	190	120
Car/Vanpool (shared ride)	95	70	150	90	175	100
Muni	160	90	320	215	270	165
BART	125	80	30	20	20	15
AC Transit	30	15	5	5	5	5
Sam Trans	10	5	10	10	10	5
SPRR (Caltrain)	10	10	5	5	5	5
GGT Bus	20	15	5	5	-	-
Ferry	10	5	5	-	-	-
Walk/c/	300	170	230	160	165	105
Other	10	10	-1	-1	-1	-1
Totals (rounded)	880	530	1,000	680	840	520
Total Daily		6,450		6,015		6,035

/a/ Person trip-ends.

/b/ The peak occurs during the two-hour peak period of 4:00 p.m. to 6:00 p.m.

/c/ These trips are solely walking trips and are not made in combination with any other form of transportation. Destinations are to other places than just home.

SOURCE: Environmental Science Associates, Inc.

the year 2000 modal splits for the project analyzed using the Chinatown analysis. The comparison indicates a higher amount of travel for most modes using the Chinatown modal splits; however, the Downtown Plan analysis uses projected outbound peak trips while the Chinatown analysis aggregates all trips (both inbound and outbound). Therefore, comparing the Chinatown modal splits with the Downtown Plan modal splits represents a conservative case for the Chinatown analysis.

It is expected that actual travel demand from the project would be somewhere in between the two analyses as A-Site could be more similar to the uses in Chinatown and B-Site could be more similar to the uses in the C-3 District.

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Applying the Chinatown modal splits to Alternative G, the sponsor's preferred plan, would yield results similar to the project, (for a complete description of Alternative G, see pp. 370 to 381). Daily trips generated would be 6035 (using the Chinatown analysis), less than one percent more than the project. Peak period and peak hour trips generated would be 840 and 520 respectively, about 16% and 24% less than the project (see table 4A above). Applying the Chinatown analysis to intersections levels of service yields the same result as with the project. A discussion of the impacts of Alternative G is presented on p. 370 to 381.

The Transportation Impact Analysis for the Proposed Chinatown Rezoning Plan uses a different method of analysis for intersection Levels of Service than does the Downtown Plan EIR (and thus this project DEIR). The DEIR used the conventional "Planning Approach" described in Transportation Research Board Circular 212. The Chinatown analysis incorporates finer grain elements used in Circular 212 "Operations and Design Method" to make adjustments for intersections with high levels of conflicts between pedestrians and turning vehicles and heavy volumes of transit vehicles. Table C&R 1, below, presents the existing conditions and existing

TABLE C&R 1: COMPARISON OF PEAK-HOUR VOLUME-TO-CAPACITY RATIOS (V/C) AND LEVELS OF SERVICE FOR EXISTING AND EXISTING PLUS PROJECT CONDITIONS USING DOWNTOWN PLAN ANALYSIS AND CHINATOWN ANALYSIS

Intersection	DEIR Analysis /a/				Chinatown Analysis /a/			
	Existing		Existing + Project		Existing		Existing + Project	
	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS
Columbus & Montgomery	0.63	B	0.64	B	0.75	C	0.76	C
Columbus & Jackson	0.66	B	0.69	B	0.67	B	0.73	C
Kearny & Jackson	0.39	A	0.39	A	0.62	B	0.64	B
Broadway & Sansome	0.78	C	0.80	C	-	-	0.82	D /b/
Clay & Battery	0.74	C	0.75	C	-	-	0.75	C /b/
Kearny & Washington	0.44	A	0.47	A	0.46	A	0.51	A

/a/ DEIR analysis includes outbound only, Chinatown analysis includes inbound and outbound.

/b/ These intersections are analyzed with the Chinatown Modal Splits but not with the Chinatown LOS method.

SOURCE: Environmental Science Associates, Inc.

plus project scenario as analyzed in the DEIR and compares them to the existing conditions and existing plus project scenario based on Chinatown modal splits and intersection level of service method of analysis. (The intersections at the freeway ramps, Broadway and Sansome and Clay and Battery are not reanalyzed using the Chinatown method for analyzing Levels of Service as they are not affected by heavy pedestrian or bus activity and trips from Chinatown represent a smaller proportion of total vehicles. They are shown in Table C&R 1 because of differences in the modal split between Downtown office worker and Chinatown office workers.) Table C&R 1, presents the existing plus project scenario as analyzed in the DEIR and compares it to the existing plus project scenario analyzed using the Chinatown modal splits and method of analysis for analyzing Levels of Service.

Comment

"The EIR apparently relies on the 1980 City Center Circulation Program analysis of pedestrian and service vehicle traffic attributable to the project. While these calculations may be appropriate for Site B, it is questionable that the retail space on Site A fits into the same product and service categories. Site A retail will be directed mainly onto its Kearny Street frontage and oriented towards Chinatown. Chinatown retail operations differ greatly from the typical retail operations found in the downtown city center studied in the 1980 report." (Michael Louie, TRIP)

Response

Specific details regarding the types of retail activities which would occupy space in A-Site have not been determined at this time. The 1980 Center City Circulation Program represents the most comprehensive data regarding loading characteristics in San Francisco at this time. The loading section of the Transportation Impact Analysis for the Proposed Chinatown Rezoning Plan does discuss specific differences in loading practices in Chinatown. But no quantitative studies comparable to the Center City Circulation Plan have been conducted in Chinatown. In the absence of Chinatown specific data on loading, the Center City Circulation Program research is the best available data.

Comment

"p. 79. Why are the year 2000 modal splits used for the cumulative impact analysis? How does the 1984 modal split for the project specific impacts compare with the articles on increased traffic on the Bay Bridge and few patrons on BART? In other words are the projections of the DTP EIR matching the reality of today." (Georgia Brittan, SFRG)

Response

See Attachment II for the articles referred to in the comment. The reasons for using year 2000 modal splits to compare the project future travel demand on transportation systems with that from cumulative development is explained in the "Regional Cumulative Impacts" section of the Transportation Impact section of the EIR (pp. 111 to 124). To summarize, year 2000 modal splits differ from 1984 modal splits because regional auto use is expected to change over time as a result of increasing congestion on bridges and freeways serving the City. This, along with transit service improvements projected for the year 2000, will result in a higher percentage of workers in the C-3 District sharing rides (carpooling) and using transit. This should not be construed to mean that there will be fewer vehicles on the bridges and freeways, but rather that more workers traveling to the C-3 District will make use of remaining available capacity in order to minimize travel time. In addition, year 2000 modal splits are based on future land use, employment and residence patterns which were in turn based on past, current and likely future economic, real estate, demographic and public policy factors. In other words, as the population of the Bay Area increases, shifts in residence patterns will occur, thus changing travel patterns. Table 4, p. 104 of the EIR, shows outbound travel demand by mode splits from the project using modal split factors for 1984 and 2000. The increase in BART riders and slight decrease in Muni riders from the project when comparing the two years indicates a higher proportion of commuters living in the East Bay and commuting across the Bay to the City. This is a result of more future housing opportunities in the East Bay as the population of the entire Bay Area increases.

It is not possible to tell whether the shift in mode choice and residence patterns has started to take place since, at this point, only three years have passed since projections to the year 2000 were made. The shifts will take place gradually over the projection period and may fluctuate in terms of mode choice from month to month or year to year.

The Chinatown modal split analysis, discussed on pp. 244 to 247, does not assume a change in modal splits over time. It is based on surveys conducted in 1983 to 1984.

TRANSIT

Comment

"[Page] 104. It should be noted here that in order for a number of person trip ends (pte) to utilize some of the travel modes listed in Table 4 (projected Outbound Travel Demand by Mode from Pan Magna Plaza Project), they would have to utilize other travel modes, namely MUNI, to get to their final destinations. As such, Table #4 may undercount the project's impacts on MUNI. This should be clarified and corrected as necessary."
(K.L. (Dan) Wong, MUNI)

Response

The modal splits contained in the Chinatown analysis (see response beginning on p. 244) may be more representative of the project as a result of the location of the project with respect to other carriers. These modal splits do show an increase in Muni ridership compared with the analysis contained in the EIR, but would not result in different Levels of Service on transit corridors. The fourth sentence in the second paragraph on p. 105 of the EIR is revised as follows (new language is underlined):

Addition of the project p.m. peak-hour Muni riders to the existing (1984) Muni ridership would increase the loading ratios on Muni, but would not change the corridor transit Levels of Service.

Comment

"p. 105. The Final should explain that BART currently is operating at level of service F and that there is no level of service description after F." (Georgia Brittan, SFRC)

Response

The EIR discusses the Level of Service F conditions on transbay BART service on p. 116 of the EIR. Passenger Levels of Service on Bus Transit are described on p. A-45 of the EIR.

INTERSECTION AND FREEWAY ON-RAMP ANALYSIS

Comment

"The two office towers would add substantial traffic, parking and public transportation demands to an area ill equipped to accommodate them." (Howard Ellman)

Response

The EIR describes the impacts on traffic conditions on pp. 119 to 124; parking is discussed on pp. 124 to 125 and public transportation is discussed on pp. 113 to 118.

Comment

"[Page] 110. It is difficult to believe that intersections in the vicinity such as Kearny at Washington and Kearny at Jackson operate at a level of service (LOS) of A during the peak commute periods. This is because the project site is adjacent to areas where the streets are currently heavily congested during the peak commute periods (e.g. C-3 CBD). Please document the sources of the data used and the methodology used to arrive at the report's LOS figures." (K. L. (Dan) Wong, MUNI)

Response

In the DEIR, intersections in the project vicinity were analyzed using a method of analysis which does not take into consideration pedestrian volumes and bus activity. These intersections were reanalyzed for the existing plus project case using new Chinatown modal splits and an alternative method of analysis of Levels of Service taking into account pedestrian volumes and bus activity. The Kearny and Jackson intersection operates at LOS B when applying this methodology and Chinatown modal splits to the project. See Response beginning on p. 244.

Comment

"Page 110 - The contention that project traffic impacts on the State Route 480 (Embarcadero Freeway) ramps would not be measurable is not substantiated. Most of the 130 PM peak hour vehicle trips generated (calculated from the information presented on Table 4, page 104) could be assumed to use either the Clay Street or Broadway Street on-ramps. These trips could account for up to a 5% increase in PM peak hour traffic on these two ramps." (Wallace Rothbart, Caltrans)

Response

The project would not generate 130 p.m. peak hour vehicle trips. The table on p. 104 depicts p.m. peak period person trip-ends generated by the project. There would be 130 person trips made in vehicles. Of these, the 60 drive alone trips would generate 60 vehicle trips and the 70 car/vanpool trips would generate about 26 vehicle trips based on an occupancy of 2.7 people per vehicle, resulting in a total of 86 vehicle trips during the p.m. peak hour. Traffic was distributed to intersections based on resident patterns; not all of the trips would use freeway ramps. About 30 vehicles were assigned to the Broadway / Sansome intersection and 52 vehicles were assigned to the Clay / Battery intersection. As shown in Table 7 on p. 121 of the EIR, Volume-to-Capacity ratios at these intersections would increase slightly but the Level of Service would remain the same. The paragraph under "Freeway On-Ramp Analysis" on p. 110 of the EIR is revised as follows (new language is underlined):

Traffic operations at intersections serving freeway on-ramps near the project site would also be incrementally affected by project-related traffic (see

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Table 7, p. 121). During the p.m. peak hour, the intersections of Broadway and Sansome Streets and Clay and Battery Streets currently operate in Level of Service C during the p.m. peak hour. Project effects at these intersections would result in an increase in the Volume-to-Capacity ratio, but the Level of Service would remain the same. See p. 121 for a discussion of cumulative impacts on freeway on-ramps.

It should be noted that when the Chinatown modal splits are applied to the project, the intersection of Broadway and Sansome would deteriorate to LOS D (see response beginning on p. 244).

Comment

"Lack of analysis of the traffic impact of the parking lot entrance on Jackson Street for Site A. This short block already has some congestion. Truck and auto traffic will exacerbate the problem. The problem of parking garage queues onto Kearny for cars entering Jackson Street needs to be addressed." (Michael Louie, TRIP)

Response

Trucks would be able to enter the ramp to the loading area in one movement (without maneuvering) and would be able to turn around on-site. Additionally, there would be space for two trucks to queue in the garage. There would also be space for 12 automobiles to queue within the garage. Queuing of vehicles on Jackson Street is not expected to occur as a result of the project.

Alternative G would have space for one truck to queue and seven automobiles to queue within the garage. No back-up of vehicles onto Jackson Street is expected with either the project or Alternative G.

WEEKEND TRAFFIC

Comments

"In Chinatown, the Portsmouth Square Garage currently experiences great traffic delay on all sides of the block due to long queuing, and we were not sure as to whether the EIR

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addressed weekend traffic. Typically, the office building EIR's do not consider weekend impacts, and we wanted to know whether this was being addressed in the EIR.

"Lack of analysis for weekend impacts, when the Portsmouth Square Garage creates parking queues that impact Kearny/Jackson intersection, Kearny Washington intersection and Kearny/Clay intersection.

"Weekend traffic is the most critical traffic problem for the project's east-west access corridors. Washington and Jackson Streets are basically community serving streets due to the one-way bisection of these two streets between Powell Street and the Embarcadero Roadway. Through traffic typically uses Broadway Street to the north or Clay and Sacramento Streets to the south. However, this situation changes on weekends when a tremendous amount of community related traffic occurs. Portsmouth Square, numerous churches, family associations, social functions at the major restaurants, and three movie theaters are all within this Washington/Jackson Street corridor. These weekend activities cause considerably more congestion than the Downtown Plan/EIR assumes in its assessment of the critical traffic periods." (Michael Louie, TRIP)

Responses

The weekday peak period was selected for analysis in the EIR as the project would generate the most traffic during this period. The office portion of the project would not generate much travel during the weekend. While residential and retail travel would be generated on the weekend it would be distributed throughout the day. Traffic counts which distinguished between vehicles bound to Chinatown and through traffic were conducted for weekday and Saturday afternoon peak periods as part of the analysis for the Transportation Impact for the Proposed Chinatown Rezoning Plan. Saturday peak period traffic volumes on Kearny St. were only 65% of those for the weekday peak period and over 85% of all vehicles represented through traffic for both observation periods. Counts were not conducted for either Washington or Jackson Streets, but the commenter's characterization of these streets as local in orientation is correct. The volumes of right turns from Kearny Street to Jackson Street, adjacent to the project site, were counted and Saturday volumes were 87% of weekday volumes.

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Pacific and Clay Streets are the only east-west streets for which weekday and Saturday counts were conducted. Traffic volumes for both streets were very similar for both observation periods. Pacific Street, which most closely resembles the character of Jackson and Washington Streets, did show a higher local traffic component on Saturday. Congestion, as measured by intersection level of service analysis, is based, however, on the degree of conflicts where streets intersect. Because Saturday traffic volumes are lower on Kearny Street and are roughly comparable on east-west streets, weekend levels of service at intersections in the project vicinity therefore would be superior to weekday conditions.

Localized congestion associated with the Portsmouth Service Garage is prevalent for both weekday and Saturday conditions. The sponsor's preferred Alternative G would add project parking in excess of its own estimated project parking demand, particularly during the weekend when office workers would not be present on B-Site. To the extent that vehicles use the project's new supply of parking, the amount of congestion experienced adjacent to the Portsmouth Square Garage may be slightly reduced.

PARKING

Comment

"P. 124. Clarification is needed on how the 24 spaces required for the elderly housing project would be covered in the valet parking alternative." (Rolland Lowe, CAC)

Response

The following sentence is added at the end of the last paragraph on p. 124:

Twenty-four spaces on A-Site would be reserved for the residential units.

This is also mentioned in the first paragraph on p. 80.

Comment

"Site A parking diagram, p. 24, suggests that valet parking puts cars in the driveway; and, separately is conformed to make interference with truck maneuvering very likely (to increase valet space). Please analyze for most likely usability of facilities." (Toby Rosenblatt, President, City Planning Commission)

Response

The vehicles depicted in the driveway of the basement in Figure 5, p. 24 of the EIR, are intended to indicate vehicles queuing, not parked. Valet parking spaces are shown located in the southern portion of the building on this plan. No parking spaces would block the driveway.

The First Basement Level Plan for Alternative G, the sponsor's preferred alternative, is shown on p. 376. With this alternative, there would be less interference from automobiles with truck maneuvering.

Comment

"[Page] 7. The current proposal calls for the project to provide a total of 170 valet parking spaces or 84 regular parking spaces. We believe that with the proposed project being located in a heavily congested traffic area, as well as the fact that the area is richly served by public transit agencies, the proposed project should only provide the minimum number of parking spaces as required by code.

"[Page] 124. If any off-street parking is provided by the project, no long term parking should be permitted. In addition, the on-site parking required by code for the proposed housing units should only be used for the housing units and not leased out to nearby residences or businesses." (K. L. (Dan) Wong, MUNI)

Response

The project analyzed in the EIR includes 139 valet parking spaces or 69 independently accessible spaces. Traffic impacts of the project on local intersections have been analyzed on pp. 119 to 121 of the EIR.

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Allowable parking on the site is discussed on p. 80. Additional parking would require CU authorization. The project would not be required to provide all short-term parking under the code as it is not within a C-3 District.

Alternative G, the project sponsor's preferred plan, would include a total of 186 parking spaces (see pp. 370 to 381).

The parking rates for the garage could be structured to encourage short-term and discourage long-term parking in the project. This mitigation measure, which could be required as a condition of project approval, by the City Planning Commission, is described on p. 153 of the DEIR.

LOADING

Comment

"Project architect previously committed his design efforts to provide full internal circulation for truck loading so that trucks would not have to back in and out of the Site A loading docks. This was critical in the effort to avoid blockage of Jackson Street. The site plan sketch inside the EIR does not seem to reflect this because pillars placement seeming[ly] block some of the circulation (page 24). We want assurance that the internal circulation as represented to TRIP in previous presentations by the architect is still intact.

"[I]n previous discussions with the architects, the architects had represented that the project would have internal loading circulation for freight traffic. And in looking at the diagrams in the EIR, it doesn't appear that trucks will be able to maneuver inside the buildings so that they will head in and be able to head out without backing out into Jackson Street and blocking traffic. We'd like to have some clarification on that issue also." (Michael Louie, TRIP)

"What would loading dock requirements be if this [project were] located in [the] C-3 District?" (Toby Rosenblatt, President, City Planning Commission)

"[Page] 24. The proposed off-street loading area off of Jackson Street should provide sufficient maneuvering and queueing room for commercial delivery trucks on-site. This would help lessen the impacts of commercial delivery trucks on traffic congestion and MUNI surface operations in the area.

"[Page] 125 [sic 126]. Table 9 (Projected Service-Vehicle Travel Attributable to the Project) indicates that the demand for off-street loading spaces will be greater than 2 vehicles per hour. As such, we believe that the proposed project should provide a minimum of three off-street loading spaces to prevent such vehicles from being necessitated to double park on surrounding streets which severely impede both traffic and MUNI surface operation." (K. L. (Dan) Wong, MUNI)

Response

Trucks would be able to enter the DEIR project garage without backing in. Trucks would enter the garage in forward motion, continue to the first basement level, and then back into the loading area. Trucks would then leave the loading area and the garage in forward motion. The vehicles indicated in the driveway of the basement on Figure 5, p. 24 of the EIR are placed to indicate queueing vehicles (see response on p. 252).

If the site were located in the C-3 District, two loading docks would be required for Site-A and one would be required for Site-B for both the project and Alternative G.

Even though the demand may be greater than two loading spaces per hour, only one would be required by the Planning Code; the project would provide two truck loading spaces on A-Site. No spaces would be required or provided on B-Site.

The project provides off-street queueing space for cars and two trucks, to prevent trucks from queueing on street and blocking traffic and Muni surface operations.

Alternative G, the sponsor's preferred plan, would be required to provide and would provide one truck loading space with access from Jackson Street and egress onto Gibb Street. Alternative G would generate an average hourly demand for two loading spaces and a peak hour demand for 2.5 spaces.

MITIGATION

Comment

"[A]s an additional transportation mitigation measure, the developer should only allow any deliveries to the project's tenants to utilize the project's off-street loading spaces. This should be specifically spelled out in both the Conditional Use Permit and the individual leases between the developer and tenants." (K. L. (Dan) Wong, MUNI)

Response

The project sponsor would request from the Department of Public Works, designation of a yellow loading zone on Washington Street adjacent to the project site for use by project tenants of B-Site. However, there is no practical way of enforcing the limitation that the zone only be used by project tenants.

The off-street loading spaces on A-Site would be at the first level basement and would only be available to tenants of the project.

Comment

"[Page] 152. An additional transportation mitigation measure that should be adopted and implemented by the developer is that of subsidizing transit passes for employees and residents of the proposed development. Such a program, either employer or lease subsidized, would greatly lessen the proposed project's transportation impacts in the area." (K. L. (Dan) Wong, MUNI)

Response

The comment is acknowledged. The Department of City Planning's Developers' Manual for the Implementation of Transportation Conditions, adopted by the City Planning Commission April 3, 1986 (Resolution No. 10659) notes, regarding sale of BART and Muni monthly transit passes on-site, "there seems little reason to regard this as an important measure to promote transit use because the great majority of employees already work in downtown San Francisco and do not need an introduction

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to available transit sales. Also, there are numerous convenient vendors who already sell the passes."

The manual recommends that employers be informed that they may purchase blocks of tickets to sell to their employees. Coordination of transit pass bulk purchase and distribution to employees can be facilitated through a new MTC program providing one-stop purchase of passes for multiple operators (pp. A-9 and 10).

The manual notes that, "with the vast majority of employees familiar with, and likely to use, public transit regardless of the inducement, there is little rationale for subsidized sales unless survey results indicate a need for additional incentives for specific tenants with low transit ridership profiles. However, those employers now subsidizing employee parking may be willing to subsidize transit use in the interest of equity" (p. A-10).

As mitigation for project impacts on the transit system, the project sponsor would be required to pay about \$861,500, the Transit Impact Development fee, to Muni and would implement a Transportation Systems Management Program.

The project sponsor has no plans to subsidize the transit passes of office employees. On-site transportation brokerage services are included as a mitigation measure, however, and it could be possible that such a program might include subsidized transit passes. Such a measure would be at the discretion of individual employers who are building tenants.

HOUSING

PREVIOUS HOUSING ON SITES/OAHPP

Comments

"We agree that on Page[s] 136 and 137 there is discussion of the whole site, which is this 164 units of the I-Hotel and what the EIR refers to as two low-cost long-term residential hotels on Lot 5 and Lot 11. There is a discrepancy between the number we got from the

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EIR, total of 264 units, and the DAHI [Division of Apartment and Hotel Inspection] figure we got of 271, and that should be corrected." (Bradford Paul, NOMPC)

"According to DAHI records, the site of the proposed project contained 271 units prior to evicting and demolition by Four Seas in 1979, DEIR states a unit count of 265. What is the real number? How many people were housed on the site? What is Four Seas responsibility to replace units they demolished?" (Chinatown Resource Center)

Response

The DEIR indicates (pp. 17 and 34) that the number of residential units on the project site was: 30 units in the Victory Hotel; approximately 70 units in the Bell Hotel; and 164 rooms in the International Hotel, for a total of 264 units.

According to records of the Division of Apartment and Hotel Inspection (DAHI), there were 30 guest rooms and two apartment units at the Victory Hotel (824 Kearny Street), 70 guest rooms and one apartment unit at the Bell Hotel (37 Columbus Street) and 164 guest rooms at the I-Hotel (848 Kearny Street).^{/1/} This is a total of 264 guest rooms and three apartment units, or 267 units. This total does not differ substantially from figures stated in the DEIR and does not change the impact assessment.

NOTE - Previous Housing on Sites

^{/1/} Richard Fong, Senior Housing Inspector, Division of Apartment and Hotel Inspection, City of San Francisco, telephone conversation, March 17, 1987.

Comments

"Although we applaud the joint efforts of the Citizens Advisory Committee, the Four Seas Investment Corporation and the City of San Francisco to develop much-needed affordable housing, the Pan Magna project falls far short of replacing the 271 combined units (according to DAHI [Division of Apartment and Hotel Inspection] records) that were demolished in 1979. Moreover, the project falls far shorter of accommodating the number of residents who were forced out of the International Hotel, the Victory Building and Bell Hotel. CCBH believes those units must be fully replaced--unit for unit.

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"The demolition of the three residential hotels, without immediate replacement or mitigation, help[ed] spur the eventual passage of the Residential Hotel Conversion and Demolition Ordinance, adopted by the Board of Supervisors in 1981. We would thus characterize the proposed 120 units as a step toward redressing the loss of the hotels." (Edwin Lee, Lorraine A. Lowe, and Alton Chin, CCBH)

"The basic point I'd like to make now, I guess, is really retreading on some of the grounds already covered, is the loss of the housing units, the 120 as opposed to the 271.

"The question of housing units is clear. The number of units destroyed should be replaced on a 1:1 ratio. It is not defined as the total human capacity of whatever housing design. In the case of this project, the proposed units should replace the loss of some 265 units of housing. It ONLY proposes to construct 120 units. As if to justify this inadequacy the project sponsor claims that as many people can live under this plan as once did (at least at the 160 unit I-Hotel). By your own claims, the population of Chinatown (and Manilatown?) is becoming more single elderly. If this is true it dooms the design of the project to inappropriateness for this group since single elderly do not cohabitate. Regardless, the bottom line is that up to 145 housing units is lost! Chinatown is just that much closer to not being a residential community. This is urban renewal by attrition!" (Don Chan)

"Housing Considerations. The DEIR treats the project site as open land. In fact, it was formerly the site of 264 units of housing./1/ The project sponsor is apparently the developer that removed the housing. The proposal studied in the DEIR cannot be made consistent with current City policy unless the developer is required to replace the housing units removed from the site and construct, in addition, the housing units necessary to meet housing production requirements. The DEIR is inadequate for failure to inform the public that under current standards, the developer's housing commitment would be OAHPP plus the units removed from the site.

"/1/ The 164 unit International Hotel and the 30 unit Victory Hotel were located on A Site. The 70 unit Bell Hotel was located on B Site. All three residential hotels were demolished in 1979. (DEIR, 1-2,9,17,136.)" (Howard Ellman)

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"We ... believe the housing impact of the Pan Magna Project, as currently proposed, transcends the demolition and replacement of existing housing. The building of 178,100 sq. ft. of office space in such a massive development will certainly generate additional demand for housing and exert development pressures on nearby neighborhoods. For this reason, Four Seas' housing mitigation should address both replacement housing and the new and additional obligation under the Office Housing Production Program." (Edwin Lee, Lorraine A. Lowe, and Alton Chin, CCBH)

"[T]he basic issue here is that we strongly oppose the developer's suggestion that the 120 units proposed meets the replacement housing and the OHPP requirement. We think they are two separate issues. One is the 271 units that were demolished by this project sponsor. Those have to be replaced one-for-one. And then for whatever amount of office space is built, there is a second requirement for OHPP." (Bradford Paul, NOMPC)

"The thrust of our concerns this evening is that of affordable housing for the Chinatown community. It's a commodity which appears to become scarcer and scarcer with each passing development. While we would welcome the proposed 120 units of low-cost housing as have appeared in the Draft Environmental Impact Report and would like to publicly acknowledge the efforts of the Citizens Advisory Committee in working towards obtaining as much replacement housing as they have, we would like to see that housing characterized as replacement housing rather than meeting the OHPP requirement.

"Our major concern involves the characterization in the EIR that these 120 units satisfies the city's Office/Housing Production Program. We would strongly object to that notion that the developer's OHPP requirement has been met through the housing portion of this proposed project.

"In 1979, Four Seas Investment Corporation demolished approximately 271 units of low-cost housing on those various sites according to DAHI records. And who knows how many more people were displaced because of the demolition? CCBH would view the efforts of the Citizens Advisory Committee, which started in '79, as bringing back, as a step towards replacement housing to our community.

"The OHPP program was not passed into law until 1985. So, to permit those 120 units to be counted towards OHPP would constitute double dipping, in our view. So we would urge

that the Commissioners view the proposed housing portion of this project as replacement and seek to impose the OHPP requirement as a separate and distinct obligation.

"Replacement Housing/OHPP. On pp.136-173 the EIR does an adequate job of describing the loss of housing attributable to the project sponsor's demolition efforts, the I-Hotel (164 units) and the two 'low-cost, long term residential hotels' on Lot 5 (70 unit Bell Hotel) and Lot 11 (30 unit Victory Hotel). (There is a minor discrepancy between the DEIR figure of 264 units total and the DAHI figure of 271.) The DEIR also identifies an O/HPP requirement of 67 units for the proposed amount of office space (172,300 s.f.).

"The Fulfillment of Housing Requirement section is wholly inadequate. We strongly oppose the developers claim that the proposed 120 units meets his housing obligation. As a matter of policy this developer must replace all 271 units he destroyed and provide whatever O/HPP requirement the final figure for office space generates." (Bradford Paul, NOMPC)

"264 units in all were demolished. These should be replaced by the developer. If they were demolished today, their replacement would be required, yet this developer is only putting in 120 units." (Jane Winslow, THD)

"200,000 square feet of new office space is not required to render economically feasible the production of 140 units of affordable housing. . . . The project would not produce a net gain of 140 housing units. The 200,000 square feet of new office space would itself create a demand for additional housing (as reflected in both the Downtown Plan EIR and the proposed [sic] OAHPP Ordinance), thereby substantially reducing (or perhaps eliminating) the net addition of units to the City's housing stock." (Howard Ellman)

"The thrust of the EIR seems to be for the economic concerns of the developer. It seems to support the developer's contention that he will be able to provide 120 units of new housing only if he builds two office buildings, one 200 feet and one 100 feet. But this is not 120 units of new housing. In 1979, 164 units in the I-Hotel were demolished, 30 units in the Victory Hotel on Site A, and 70 units in the Bell Hotel on Site B.

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"Four Seas is saying, and the EIR seems to support their position, that they can afford to provide only this 120 units of housing, and if they are granted all sorts of special zoning changes allowing them to build approximately 300 feet of office space." (Jane Winslow, THD)

"The project sponsor contends that it must be allowed to build the C-3-type office building in order to provide economic support for its housing project. On the face of the data presented within the four corners of the DEIR -- and publications of the Department which are in the public domain -- that economic proposition is implausible on its face. And the planning policy it articulates -- that a party willing to build housing is entitled to build an office building to provide economic support for the housing, no matter what the zoning or master plan might say about the location or type of the use -- completely destroys the rationale of the City's planning processes.

"That is particularly true in this case. All other office developers are required to add to the City's housing stock as the price for approval of new office structures. These developers are asking to be rewarded for reducing the aggregate number of housing units on the two sites by more than fifty percent." (Howard Ellman)

Response

The project would include 120 residential units and would not replace, one for one, the 267 units that formerly occupied the site. The project would provide housing for 160 residents. It is not known exactly how many residents formerly lived in the I-Hotel, Victory Hotel and Bell Hotel. The three hotels formerly located on the two sites contained rooms without individual kitchens or bathroom facilities.

People displaced from the site originally were mainly senior citizens. The housing proposed is designed to meet the specific needs of seniors better than the hotel-type housing that previously occupied the site.

Alternative G, the sponsor's preferred plan would provide six more housing units than the project. The housing would consist of 35 double units at 325 sq. ft. each, and 91 single units at 250 to 300 sq. ft. each for a total of 126 units. Alternative G would house 161 persons. It would also provide less office space (81,300 sq. ft.) than

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the 178,100 sq. ft. included in the project. Because there is 5,800 sq. ft. of existing office on B-Site, using the OAHPP formula (.000386 units x net new office space), 29 units would be required for Alternative G.

Alternative G, the sponsor's preferred plan resulted from extensive negotiations between the City, the sponsor and the Citizens Advisory Committee. The City Planning Commission in deciding on project approval will determine if this solution is acceptable.

Subsequent to, and partially in response to, demolition of units in the I-Hotel, the Board of Supervisors enacted the Residential Hotel Conversion and Demolition Ordinance in 1981. As stated on p. 68 of the DEIR, this law allows conversions and demolitions of residential hotel units only if the units are replaced, or a payment of partial replacement cost is made by the developer into the Hotel Preservation Fund. Due to ineffectiveness of the ordinance in directly solving conversion problems in the Chinatown-North Beach area, a moratorium against conversions was adopted for this area in May 1984. The ordinance requires a one-to-one replacement for lost units, but it was not made retroactive and therefore does not apply to the former units on the project site. Policies in the Master Plan and Chinatown Plan also call for one-to-one replacement of housing units converted or demolished. Again, these policies were not made retroactive. Thus, the requirement on the project sponsor to construct new housing or pay a in-lieu fee is contained in the Office Affordable Housing Production Program (Section 313 of the City Planning Code). There is no legal requirement to replace units removed from the site prior to 1981.

Section 313(e)(3) states that the Director of City Planning shall make the "initial determination as to whether the [housing development project] plan is in compliance with this Section." That determination is appealable to the Planning Commission. The Director has indicated that the project satisfies its housing requirement.

If existing San Francisco offices relocate to the project, no new demand for housing is created by jobholders. If the new jobs are created in the City or offices relocate to San Francisco from outside the City, then a demand for new housing would result. The interaction between employment growth and housing market impacts of that growth is discussed in the DEIR on pp. 138 to 146.

Comment

"[W]e feel the Draft EIR is inadequate in discussing the various formulas in how the OHPP monetary requirement was arrived at. Given the significant contribution from the city of the [\$]1.5 million in block grants and the various exempt, tax-exempt bonds, plus the additional cash contribution, it's very unclear as to how the figure of \$920,082 was arrived at in calculating Pan Magna's OHPP. The Draft EIR should contain the full text of the OHPP ordinance.

"In addition, it would appear that in view of the contribution from the city, the OHPP figure arrived at would be fairly light given the city's contribution." (Deborah Lim)

Response

As stated in the Draft EIR, the Office Affordable Housing Production Program (OAHPP) requires that the project sponsor construct new housing units or pay an in-lieu fee to the City to subsidize housing development. The two formulae contained in the OAHPP ordinance are stated on p. 137 of the DEIR. (The entire ordinance is too lengthy to include in this document; it is Section 313 of the City Planning Code.) To determine the number of housing units a developer of new office space must provide, total net new space feet is multiplied by the factor 0.000386. The proposed project would construct 172,300 sq. ft. of net new office space (based on 178,100 gross sq. ft. of office space less 5,800 sq. ft. of existing office space on B-Site), and therefore, would require 67 housing units ($172,300 \times 0.000386$). In lieu of building housing units, the sponsor could contribute funds to the City, based on the formula, total net new square feet of office space multiplied times \$5.39. This formula would require an in-lieu fee of \$928,697 ($172,300 \times \5.39).

The OAHPP formula is calculated without regard to any other subsidy or tax benefit received by the developer. Hence, the project's \$1.5 million block grant and any tax-exempt bond are not reflected in the calculation.

Alternative G would not include office development on A-Site. B-Site would remain unchanged. Therefore, this alternative would consist of 81,300 sq. ft. of office space or 75,500 net new sq. ft. and would result in an OAHPP requirement of 29 housing units or an in-lieu fee of \$403,170.

Comment

"p 9. Employment and Housing. It would be helpful to compare the prior floor area of housing with what is now proposed, in addition to the present discussion of the numbers of units involved." (Rolland Lowe, CAC)

Response

Approximately 53,700 gsf of residential space is proposed in the DEIR project. There is no data available on floor area of the I-Hotel, however, the I-Hotel was four stories tall, the lot area is 15,125 sq. ft. Therefore, the building probably contained about 60,500 sq. ft. (not all of the space on the ground floor was devoted to residential units). The Victory and Bell residential hotels, which were also previously located on the project sites were four and three stories tall, respectively. The Victory had a lot area of 3,795 sq. ft. and therefore, the building probably contained about 15,180 sq. ft. The Bell Hotel, with a lot area of 6,775 sq. ft., probably contained about 20,325 sq. ft. As with the I-Hotel, not all of the ground floor space of these hotels had residential units.

Alternative G, the sponsor's preferred plan, would contain about 51,900 gsf of residential space.

Comment

"What efforts will be made to locate former International Hotel tenants? (Chinatown Resource Center)

Responses

As stated in the Memorandum of Understanding (MOU) between the Mayor, Four Seas Investment Corporation and the Citizens Advisory Committee on the International Hotel, "Bonafide elderly and disabled tenants living in the I-Hotel at the time final eviction notice was served will be given first priority for occupancy in the new housing." The Citizens Advisory Committee maintains contact with former residents, although many have died or moved out of the area. Several former residents serve on

the CAC. The method of locating former tenants of the I-Hotel has not been determined. However, the assistance of the Citizens Advisory Committee will no doubt be sought.

CHINATOWN HOUSING ISSUES

Comment

"One of the things I have contention with and I don't have any hard facts, but I doubt that very many other people have any harder facts than have been used in the EIR [and] in the zoning proceedings that the city's been running on the Chinatown Plan. Beyond those figures, I don't think anyone has any real concrete conception of the true characteristic of the population in Chinatown. We are talking about replacement housing that was at that point meant for elderly single people. If you are doing it on a one-to-one basis, then you're going to replace it with appropriate housing for that type of person.

"As the changing nature of Chinatown goes, there are more families moving in. I don't have hard facts. But as we keep replacing lost housing units which were only in aeons-ago history meant for single people, we are going to be condemning Chinatown to be a neighborhood of elderly people, and as they die away, then the housing again becomes inappropriate.

"I think that the Planning Commission or the city should address another concern, is how are we going to construct new or replacement housing that's going to be also beneficial or appropriate for the new families coming in? Not to reduce it to 120 or a less amount because more occupancy per unit, but to meet both needs, the single elderly, elderly couples, and new housing for families."

"My own feelings are that the statistics used by City Planning to describe Chinatown's population characteristics are skewed and inaccurate. Working within youth services we are seeing more and more families with children under 16 yrs of age, many living in residential hotel rooms in the center of Chinatown. The claim that only about 916 children (City Planning issue paper) fit this bill is outrageous. By doing this, you are justifying the replacement of housing suitable only for elderly singles or couples. And

while destroyed housing was only meant for such people, it's replacement does not meet the need of the displaced families that once lived in them. When are you going to speak to this?" (Don Chan)

Response

Much of the demographic information presented in the Department of City Planning publications on population and housing characteristic of Chinatown has been extracted from the U.S. Census. In addition, neighborhood groups, such as the Chinatown Coalition for Better Housing, also compiled statistics which were presented in the DEIR. These sources appear to be the best available demographic data for Chinatown.

Between 1970 and 1980 the population of Chinatown was aging and single person households jumped dramatically from 55% to 66% of all housing units. At the same time, the bulk of housing being demolished or taken out of the residential market in Chinatown were residential hotel rooms, traditionally occupied by individual persons. The project has been designed to provide housing for a specific and substantial segment of the neighborhood population.

Comment

"DEIR states that 'between 1980 and the end of 1983, about 11% of the total number of housing units in the Chinatown area were rehabilitated through various private and public loan and grant programs.' What is the source of this figure?" (Chinatown Resource Center)

Response

"Housing in Chinatown" Issue Paper No. 2, prepared by the Department of City Planning in March 1984, states that there are approximately 6,600 units in the Chinatown Study area (3,800 residential hotel rooms and 2,800 apartments, p. 10). Page four of the Issue Paper describes loan and grant programs including the Community Housing Rehabilitation Program (380 units), Block Grant Site Acquisition program (221 units) and a privately funded program undertaken by the Chinatown

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Community Housing Corporation and San Francisco Savings and Loan (140 units). These three programs total 741 rehabilitated units, approximately 11% of the 6,600 units identified.

Comment

"p. 66. The reference to social service agencies should have a source." (Rolland Lowe, CAC)

Response

The Department of City Planning's background issue paper No. 2 entitled, "Housing in Chinatown" (March 1984) notes that approximately 38 public service agencies serve Chinatown and describes those with specific housing-oriented functions. The Department's background issue paper No. 5 entitled, "Urban Design, Preservation, Open Space, [and] Social Services in Chinatown" (April 1986) describes other services provided by a variety of public and private health, education and welfare agencies.

EMPLOYMENT, OFFICE MARKET AND VACANCY RATES

Comment

"The new office space and the new retail space that's being offered, the rents are going to go up between three to five times the amount of the rents that they're charging now. The major problem with small business in North Beach is that they can't afford the rents, or if they can afford the rents, they can afford to pay the landlords of their business and not the landlords of their home." (Lisa Huggins)

Response

Based on a tenant survey conducted June 4, 1986, by ESA, the average rent for space in the Colombo Building was \$.82 per sq. ft. per month or about \$9.95 per year. Rents ranged between \$.44 and \$1.50 per sq. ft./1/ The office space of the proposed project is estimated to rent between \$26 to \$32 per sq. ft. per year. Retail space is estimated to rent between \$28 to \$36 per sq. ft. per year (p. 35 of the EIR). The

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commenter is correct that the rents in the proposed project could be three to five times higher than existing rents in the Columbo Building. However, as noted in the response on p. 192 of this document, rents would reflect the market at the time space in the project becomes available.

Comment

"I guess something that is not being addressed in the EIR is, I am not a physically handicapped person nor an elderly person, but I am going to be evicted eventually. Where am I to go? It doesn't address that." (Lisa Huggins)

Response

The DEIR states on p. 134 that the 35 employees currently on B-Site would be displaced. The relocation of employees and businesses would depend on local and regional economic factors as well as business considerations and preferences of the individual businesses on the site. Displacement is a matter which the Planning Commission may take into consideration in deciding on project approval.

Comment

"The EIR asserts that 35 employees in the Columbo [sic] Building will be displaced. None of the other tenants to whom I have spoken was ever interviewed about how many people worked in the building. This number may be inaccurate.

"On page 78, the EIR asserts that 'The project would not change the historic uses on the sites. . . .' If that means that the existing neighborhood-serving businesses, or similar ones, might come back into new, expensive quarters, then the EIR is wrong. The big problem with the demolition of sound, functional buildings like the Columbo Building is that the little businesses seldom can afford to come back, even if they were willing to return to a building with little inherent character and no historic involvement with the neighborhood." (John A. Knox)

"The project would not change the historic uses on the site.' (Page 78.) Show history of office uses on A-Site." (Chinatown Resource Center)

Response

A Business Tenant Survey was conducted June 4, 1986 in response to the above comment. Of the 17 businesses currently operating in the Colombo building, 12 returned questionnaires. Some information for the remaining tenants was gathered from one long-time tenant of 50 years. The results of the survey are as follows:

- Of the total number of businesses, six are located on the ground floor with street access and 11 are located in small offices on the second floor. There also is a Chinese social club, located at the ground level on Washington Street.
- The average length of tenancy in the building is 14 years; 11 of the 17 businesses have been in the Colombo Building for over 13 years. The range of tenancy is six months to 33 years.
- All tenants rent on month-to-month lease agreements. The average rent per square foot per month is \$.82 with a range of \$.44 to \$1.50. The average amount of square footage rented is 750 sq. ft.
- The Colombo building has a total of 47 employees (including business owners), of which 26 are full-time employees and 21 part-time. Except for several artists/designers and a restaurant, all the businesses operate during normal office hours, Monday thru Friday. The Turning Earth Restaurant on Columbus Avenue sub-leases space to about ten organizations for evening and weekend meetings.
- When asked about possible relocation plans if the Colombo building is demolished, seven businesses said it was imperative for their businesses to remain in the area, although most indicated they were skeptical about finding affordable replacement space. Five businesses said there was a strong possibility they would go out of business if evicted, again due to the need for affordable space. Only one business said it would consider moving out of San Francisco; all the other businesses said they would not move out of the City.

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- Three business recently have moved out of the building because they need a more permanent lease agreement.
- The types of businesses located in the building include retail, a restaurant, a barber shop, and a dry cleaners on the street level, with artists, designers, architects, a real estate broker and a freight and trading company on the second floor. All the businesses are small and independently-owned. They serve the residents of the immediate neighborhood as well as downtown and Chinatown employees and businesses.

The statement on p. 78 referred to by the commenters means that the land uses historically present on the site, e.g., residential use on A-Site, and retail and office on B-Site, would continue to operate or be reintroduced by the proposed project. The complete quote is, "The project would not change the historic uses on the sites but would affect the scale and character of the surrounding neighborhoods except for the Financial District." The specific business firms would likely change, and it is possible that businesses which depend on below-market-rate rents would be priced out of the project after its construction.

The second and third sentences of the first paragraph under the heading "Employment" on p. 134 of the EIR are revised as follows (new language is underlined):

The 47 employees currently on B-Site would be displaced. There would be a net increase of about 703 employees.

Comments

"Conditional Use approval requires a finding of overriding necessity. How do you justify overriding necessity for more office when Mr. Macris himself has questioned this need? You already know about the office vacancy rate, so I am not going to go on about those figures.

"Within one and a half blocks of this site there are many empty office spaces. A two and a half year old new building at the corner Pacific and Columbus, the Pancini Building, is about 75 percent empty still after two and a half years. A renovated building across the street from Brandy Ho's, at 222 Columbus, is about 50 percent empty, and it's been that way for at least a year and a half.

"The EIR does not address the effect of the many empty office buildings on the economic life of this neighborhood.

"There is not an established office market in this area. If new tenants do come, they will be drawn from the traditional Finance District to the south. Within three blocks to the southeast, there are many new buildings at -- many new office spaces that are empty in 240 and 456 Montgomery. These are unleased. 505 Montgomery is on hold but will also create more unused office space. Next year, the Bank of America will add an additional 200,000 square feet of empty office space to this pool.

"What is the overriding necessity for this?" (Jane Winslow, THD)

"The construction is justified or -- in the EIR -- on economic considerations when the Planning Director in the first review period, the first beauty contest, if you will, under the Downtown Plan has said that construction of C-3 buildings is uneconomic and hence not necessary in the very area which the Downtown Plan designates as the area where those uses should be concentrated -- namely, C-3-0 Special Use District.

"The EIR makes no mention of any of these things and is really inadequate for failure to do so because to inform the decision-makers and the public, the EIR should describe how approval of this project will require the city to bend and indeed go against some of the policies it's most recently adopted." (Howard Ellman)

"Demand for Office Space. Although this project is not part of the 'beauty' contest, we feel the EIR must address in more detail the demand, if any, for the office portion of the project in light of:

1. The Department's own March 20, 1986 report in which the Department states 'all office markets, including back office, appear to have more than adequate space available...' for a period beginning three years from now.
2. Today's office vacancy rate stands at 16.5%.
3. Office projects in the pipeline, approved or under construction, amount to 7,500,000 s.f. ... the equivalent of 15 Transamerica Pyramids." (Bradford Paul, NOMPC)

"There is no current need for office space. Another compelling reason why other alternatives should be looked into for this site is that there is no current need for office space at that location, in the major downtown area and in other parts of the City. So, why should you grant an office development of this size and type? We believe it represents poor planning." (Dick Grosboll, SFT)

"DEIR states that project is proposed to respond to demand for new office space. Yet, the Planning Department's 'San Francisco Office Development Limitation Program, First Review Period Evaluation Report' says: 'All office markets, including back office, appear to have more than adequate space available. There appears to be no compelling reason for the Commission to approve additional office space at this time.' Please respond to this apparent contradiction, with particular reference to the 'necessity' test for conditional use approval."

"Note that the Planning Department is currently using 17% as office vacancy rate. Please correct on page 64." (Chinatown Resource Center)

"In the area of demand for office space, I think other speakers have covered this. The department's own March 20th report concludes that, quote, all office markets, including back office, appear to have more than adequate space available. This is for a period beginning three years from now. And you're familiar with that. There is no demand for this office space. Today's office vacancy rates stands at somewhere between 15 and 17 percent, and there are millions of square feet in the pipeline." (Bradford Paul, NOMPC)

"As has been said here, the vacancy rate in San Francisco certainly is as high as most cities in the country and higher than many. In fact, it's unwise tax policies that really have encouraged -- not demand, but unwise tax policies that have encouraged the construction of office space -- in effect, replacing something useful with something that has not to date proven useful." (Mark Kasky)

Response

At the time the DEIR was published, the City Planning Department was reviewing a number of proposed office projects in the first round of review under Section 321, Office Development Limits, of the Planning Code ("the Beauty Contest"). No

projects were approved during that round of review. The second review under Section 321 of the Planning Code is in progress. The Planning Commission will decide in June 1987 which projects, if any, will be approved. The Planning Commission may approve up to 950,000 sq. ft. of new office space in June 1987 (475,000 sq. ft. from each of the first two review periods). If the current project is approved, its square footage will be subtracted from this amount.

Section 321(b)(3) includes guidelines to be used by the Planning Commission when considering office projects subject to that section. They include the "anticipated uses of the proposed development, in light of . . . the available supply of space suitable for such anticipated uses." The project is not subject to Section 321 review (see p. 215).

The "necessity" test, referred to by the third commenter, for conditional use approval, refers to Planning Code Section 303(c) 1 which states, " . . . The City Planning Commission shall approve the application and authorize a conditional use if the facts presented are such to establish:

1. That the proposed use or feature, at the size and intensity contemplated and at the proposed location, will provide a development that is necessary or desirable for, and compatible with, the neighborhood or the community; and . . . "

The Planning Commission, in its deliberations on the proposed project, will make the determination of necessity and desirability. The purpose of the EIR is to describe the impacts of the project as proposed, specifically and in relation to cumulative development, not to establish whether or not there is a "need" for the project.

See the response on pp. 279 to 280 for a discussion of current office vacancy rates in San Francisco.

Comment

"p. 15. Please state whether any of the space has been leased to tenants. This is critical in light of the Department's view that no office space should be approved in the first round of the competition due to the high vacancy rates." (Georgia Brittan, SFRG)

Response

No tenants have been secured for the proposed office space. See also the previous response.

Comment

"On Page 78. I find it difficult that the department has assumed that something is a response to a problem if there is money to be made. Paragraph 3, the second sentence in parentheses: The project is a response to existing pressure of this type. And the existing pressure is the pressure to convert nearby uses from low-income housing to higher income-producing uses. It's like the only thing that is legitimate is financial -- who has the maximum revenue. There is as much pressure from the community for affordable housing and community-serving businesses as there is for people to make money. But if you're saying you can only measure pressure by money, the people will never be able to be listened to." (Sue Hester, SFRG)

Response

The EIR does not characterize the project as "a response to a problem." The complete statement referred to by the commenter, in context, is, "The project could increase pressure for conversion of nearby uses from lower-income-producing uses to higher-income-producing uses. (The project is a response to existing pressure of this type.)" This is an accurate observation which is not intended to "legitimize," condone or condemn this phenomenon.

Comment

"p. 35. Please compare the prices that the project is expected to rent for with current prices of office space and prices in 1981/82 when the Downtown Plan EIR was written." (Georgia Brittan, SFRG)

Response

The Rubicon Group's most recent survey of office space (December 31, 1986) indicates the average overall price per sq. ft. in the central financial district was

\$24.10 (including utilities, etc.). The average overall price for sublease space was \$24.15. The Jackson Square area, had an overall office rental rate of \$22.39 per sq. ft., with a sublease rate of \$18.06 per sq. ft. C-3 District rents are shown in Figure IV.B.1, p. IV.B.6, of the Downtown Plan EIR. Rental rates for office space in the financial district, north of Market and east of Kearny, ranged between \$32 to \$35 per sq. ft. for new buildings and \$18 to \$22 per sq. ft. for old buildings.

Office space in the proposed project is expected to rent for about \$26 to \$32 per sq. ft. (p. 35 of the EIR). The projected project office rents are therefore slightly higher than the Rubicon 1986 survey, and at the low end of the office rents estimated for 1981-82 in the Downtown Plan EIR.

Comment

"p. 64. Please explain the discrepancy between the two vacancy rates. The commenter understands that one is Citywide and the other is downtown San Francisco including South of Market office buildings. Does this mean that there is a lot of office space outside of Downtown and that it is all or mostly all leased? What type of rents do these offices charge? Please explain in absolute amounts the total square footage of office space that is vacant in San Francisco grouped by age of building (i.e. 1 to 3 years old, 4 to 7 years old, 8 to 10 years old and over 10 years old) with an explanation of how the information was derived. This information will give decision makers and the public a sense of what type of office space is vacant, less vacant or more vacant than other types of office space. Please include a discussion of the Department's own analysis of the vacancy rate as well as a discussion of the issue of vacancy rates as brought up by developers during the hearings on the first round competition. Please explain why there appear to be so many differing reports as to what is the vacancy rate in San Francisco. (Georgia Brittan, SFRG)

"I am incorporating by reference this afternoon's Examiner article on office vacancy rate, which is on the front page of the business section [see Attachment II of this document]. That section relates a Coldwell Banker survey that says there is a 15.7 percent surveyed office vacancy rate. It's unclear how much of the space that is on the secondary market for subleases is in there, but they do mention that is the 800,000 plus square feet from the Bank of America in there. That should be part of the record." (Sue Hestor, SFRG)

Response

The two vacancy rates presented in the EIR on p. 64 are from the Building Owners and Managers Association (BOMA) and the Coldwell Banker surveys. BOMA's survey covers 319 office buildings Citywide; Coldwell Banker surveys major competitive multi-tenant office buildings in the central core of San Francisco (the area bounded by Howard St., Third St., Kearny St., Washington St., and the waterfront). The BOMA survey discussed on p. 64 of the EIR reports vacancy rates for 1983 and 1984. The Coldwell Banker survey covers 1985. Coldwell Banker's survey of September 1984 showed a vacancy rate of 9% comes closest to the BOMA figure for 1985 of 6.8%. The survey results are not directly comparable for several reasons:

- The BOMA survey includes office and retail space while the Coldwell Banker survey only includes office space.
- The geographical areas surveyed are not the same.
- The Coldwell Banker survey includes every building in downtown San Francisco over 10,000 sq. ft., while the BOMA survey is a random sample only (i.e., buildings BOMA knows about or has surveyed in the past). Most of the buildings in the Coldwell Banker survey were constructed since World War II, although buildings that have been well-maintained or renovated are also included. Newly constructed office buildings are added to the survey upon completion.

These surveys are not broken down by rent rates or age of the building, and the information requested cannot be obtained from them.

The latest Coldwell Banker survey (December 31, 1986) indicates an office vacancy rate in downtown San Francisco of 18.1% (this is an increase from the reported vacancy rate of 15.7% in March 1986, 16.2% in June 1986 and 16.6% in September 1986). The Coldwell Banker Survey reports the national downtown office vacancy index as of December 31 1986 as 16.8%. The index covers major competitive multi-tenant office buildings of greater than 30,000 square feet. It excludes government-owned buildings, medical buildings, office condominiums and buildings that are clearly not competitive in today's marketplace.

The latest Cushman & Wakefield survey (December 31, 1986) indicates an office vacancy rate in the Financial District of 16.5%, as compared to 12.9% in December 1985.

By comparison, office vacancy information was also collected by the Rubicon Group and is available as of December 31, 1986. The vacancy rates reported include all existing vacant space that is anticipated to become available during the first three months to 1987. In the Central Financial District 13.22% of all space was reported as vacant (4,096,837 square feet), with 9.46% (2,931,720 square feet) from direct space and 3.76% (1,165,497 square feet) from sublease space. In the South of Market Area 18.55% of all space was reported as vacant (1,511,303 square feet) with 17.23% (1,332,400 square feet) from direct space and 2.33% (180,098 square feet) from sublease space. Overall office vacancy in San Francisco was reported to be 13.25%./2/

Since December 1985, the Department of City Planning has been preparing a data base of the City's C-3 office space inventory. As of March 1986, the Department's data base had up-to-date first quarter (January-March 1986) data on 60.6% (176 office buildings) of the total C-3 office space (38,694,086 sq. ft. out of a total inventory of 63,832,650 sq. ft.). The inventory includes buildings recently completed and buildings available for lease. The data base includes location by street address, net rentable sq. ft. of office space, average floor size, vacant sq. ft. and vacancy percentage of each building. The information was compiled from the Department's files and from data supplied by various real estate firms. The data base tabulations are available for public review at the Department of City Planning, 450 McAllister St., Fourth Floor, San Francisco. The overall office vacancy rate in the downtown (C-3 district) according to the Department's data base was approximately 16.5% as of March 1986.

Comment

"p. 64. [sic p. 65] Please explain the last sentence of the Section entitled 'Vacancy Rates and Commercial Rents' in light of the fact that the Downtown Plan EIR does not assume that rents would drop (see p. C&R B.51, Section B.3 Responses to Comments DTP EIR EE #81.3). If the assumption in the DTP EIR is incorrect as this passage from the I-Hotel

EIR implies what does that mean for the assumption? Particularly how could this alter the DTP EIR's concept of absorption and the timetable for absorption? If the assumption that rents could fall had been made how would the analysis [have] been different and would the decision makers and the public [have] had different information before them when the DTP EIR was undergoing review in the Spring and Summer of 1984?" (Georgia Brittan, SFRG)

Response

The Downtown Plan EIR used a long-term (15- to 20-year) forecast approach to analyze impacts of possible growth scenarios. The scenarios varied based on different growth controls. The EIR did not provide a short-term forecast of two or three years into the future. The long-term forecast accounted for highs and lows in the building market cycle. As noted in the Responses to Comments on the Downtown Plan Draft EIR, recent, short-term rates of project approvals and construction are not properly used to determine long term results because there are cycles in the downtown real estate market (pp. C&R-B.72-13). The cited pages and others in the Responses section B.1 (pp. C&R-B.1-24) provide explanations of why the then-recent office space growth rate covering 1980-1983 was not used for long range growth projections in the Downtown Plan EIR. These points were made in response to several comments suggesting that the space and employment forecasts in the Downtown Plan EIR were too low, based on the high rate of growth in the recent past (1980-83), (see, e.g., Vol. III, Part 2, Comments, transcript of April 26, 1984, p. 102, lines 1-20; p. 109, line 16, p. 110, line 12; written comments, pp. 138, 192, 230 and 280). Comments on this project EIR imply that the current vacancy rate for downtown office space (estimated by the Department of City Planning at about 16.5%, see "San Francisco Office Development Limitation Program: First Review Period," March 20, 1986, pp. 6 and 11) shows that the Downtown Plan EIR forecasts were too high rather than too low as alleged in the Downtown Plan EIR Comments. In both cases, the response remains the same: a short-term growth rate is not a reasonable indicator of long-term growth (see Downtown Plan EIR Responses pp. C&R-B.12-14).

The current cycle, including large amounts of office space presently available and likely to become available for occupancy over the next year or more, is not a direct result of the Downtown Plan itself. That there would be considerable amounts of

office space available for occupancy during the middle and late 1980's is one of several factors taken into account in the forecast for 1990 and applies to all of the Alternative growth control scenarios studied in the Downtown Plan EIR. These cycles, and in particular the expected vacancies in the late 1980's, were part of the reason for the conclusion in the Downtown Plan EIR that no Alternative would appreciably change the space or employment forecasts until after 1990 (see Volume I, pp. IV.B.21 and IV.B.23-30, and Volume III Responses, pp. C&R-B.9-11, in the Downtown Plan EIR). In other words, the development activity already occurring and expected to occur was assumed to affect absorption of office space until the year 1990, with limited influence from any proposed growth control including the Downtown Plan. In fact, a short-term oversupply of office space was noted as a possibility in the Responses to Comments in the Downtown Plan EIR on p. C&R-B.10. It is only after 1990 that Downtown Plan influences on growth are likely to be felt. (See Downtown Plan EIR pp. IV.B.23-30 and Chapter VII, Alternatives).

The recent decrease in rents is consistent with the Downtown Plan EIR analysis which shows employment growth and the absorption of space continuing at a strong pace through 1990 (because of the relatively large amount of space in projects already approved prior to the implementation of the Downtown Plan). There is nothing in the current rent levels to suggest that the Downtown Plan EIR long-term forecasts should be revised.

The role of rents as used in the Downtown Plan EIR analyses and forecasts has been described in responses to comments on other Draft EIRs. Relevant parts of one of those responses are summarized below:

In the real estate market, rents are indicators of the market price for space. Rents reflect both the costs of production (supply factors) and the ability and willingness of businesses to pay for space (demand factors). Rents are also indicators of the overall operation of the real estate market. Changes in rents reflect changes in both supply and demand factors: for example, the amount and types of space available, the range of choices in competitive locations, business preferences for space of various types and in various locations, and the overall strength of economic activity.

The recent history of San Francisco's downtown office market provides a case study example of the role of rents as adjustment factors reflecting changes in the relative balance of supply and demand. Rents increase when the supply of space is scarce relative to demand. This was the situation in San Francisco in

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the late 1970s through the early 1980s. Rents were high and increasing while vacancies were low. In this situation, rents rise as high as the market will bear, i.e., as high as businesses are willing to pay before they start looking for alternative, lower cost, locations. The situation of increasing rents and low vacancy rates also stimulates a supply response, as the rate of return from investment in new space appears increasingly attractive. The resultant boom in office building construction introduces a change in the supply side which eventually affects the market price, i.e., rents. This scenario has occurred in downtown San Francisco since the early 1980s. Rents remain constant or decrease when supply is large relative to demand. When the large amount of space supplied by the boom in office building construction comes on the market, the situation is reversed from a seller's to a buyer's market. Potential tenants have a variety of options to choose from and lower rents (i.e., lower prices for space) are the principal market mechanism available to increase consumption.

The role of rents in the downtown office market is described in the Downtown Plan EIR for the purpose of explaining the implications of Downtown Plan policies on project feasibility and the rate of office development. (See Downtown Plan EIR, pp. IV.B.37-41 and Appendix G, pp. G.11-17.) This dynamic process, in which rents are the mechanism by which a market equilibrium is sought between periods of scarce supply relative to demand and periods of large supply relative to demand, was one of the considerations in preparing the analysis and forecasts for the Downtown Plan EIR.

As illustrated above, much of the everyday concern about office rents focuses on this role as a market adjustment factor during the short-term cycles that characterize the office real estate market. On the other hand, the Downtown Plan and Alternatives forecasts are concerned with long-term growth. Therefore, although rents, and their role in real estate market operations, are one of the factors considered in preparing these forecasts, it is largely from the perspective of identifying potential locations for office activity and their relative ability to attract growth over the long term. To develop a long-term 20-year forecast of growth, it is not necessary to specify the peaks and valleys of short-term cycles in the market place. In fact, it is precisely because of the role rents play as adjustment factors, bringing the market back into line from either the peak stage or the valley stage, that the long-term forecasting analysis can proceed on the understanding that short-term cycles are inherent in the market process, and therefore, it is neither necessary nor appropriate to track them for the purposes of long-term analysis. [Second and Folsom Supplemental EIR, certified December 19, 1985, pp. 137-141; this material is incorporated by reference.]

The Center for Real Estate and Urban Economics at the University of California, Berkeley, has presented the results of a computer simulation of the office space market in a working paper entitled, "The Proposed Growth Limit on Commercial Construction for San Francisco" (Kenneth Rosen and Ruth Shragowitz, Working Paper No. 85-94, May, 1985). The statistical model of office space supply and demand examines effects on office rents and vacancy rates. This working paper provides additional explanation of the interaction between supply, demand, rents, and vacancy rates in the office real estate market.

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Decreasing rents may result in existing office space filling up with tenants; this would not likely cause additional growth and cumulative impacts as the Downtown Plan EIR assumes that 95% of existing space is occupied.

Comment

"The City has assumed that office vacancies will be a part of the City's economic fabric and that the demand for office space has dropped from the levels in the first half of the 1980s. This EIR overlooks the fact that 2.7 million square feet of office space was approved in 1985. If a lot of office buildings are going to be sitting vacant for several years to come, the City ought to look into instituting a program whereby after a certain amount of time (say 3 months from completion), if a developer has not leased a certain percentage of the building (say 45%), the developer should make a portion of the building accessible to homeless people as a place where they can have shelter. San Francisco has many homeless people and not enough shelters." (Georgia Brittan, SFRG)

Response

The City Planning Commission, in its decision regarding certification of this EIR, will determine the measures necessary to mitigate any disclosed potential impacts of this project. The problem of homeless people in San Francisco is an on-going problem which is likely to continue regardless of Commission action on this project. Vacant office space cannot be used as shelter for homeless people since it would not meet the San Francisco Building Code life-safety features required for residential occupancy.

GROWTH INDUCEMENT AND PRECEDENT SETTING IMPLICATIONS

Comment

"Pressures on North Beach. Having been unpersuaded by arguments to the contrary, we have concluded that approving the proposed project will certainly have a growth-inducing impact on North Beach and the other surrounding areas, which means higher rents." (Dick Grosboll, SFT)

Response

The comment is acknowledged. As noted in the second paragraph on p. 148 of the EIR, "If marketed successfully, the project would have growth-inducing effects in and around North Beach and Chinatown by demonstrating a market for office space." Please see previous responses beginning on p. 270 regarding rental rates in the site area.

Comment

"Growth inducement (Page 78). 'The project could increase pressure for conversion of nearby uses from lower income producing uses to higher income producing uses. (The project is a response to existing pressure of this type.) Give evidence of continuing pressure for office space in Chinatown.'" (Chinatown Resource Center)

Response

The statement referenced on p. 78 of the EIR by the commenter does not specifically refer to pressure for office space, rather it states, "pressure for conversion of nearby uses from lower income producing uses to higher income producing uses." Examples could include new retail space displacing old retail space, or new retail space displacing existing residential space. However, it should be noted that the Chinatown Permanent Controls (see response beginning on p. 204) regulate the Chinatown area. While the controls do not prohibit office development, they encourage retail and residential development in Chinatown.

Comment

"Page 147, the growth-inducing impacts of this section are really tremendously inadequate because it really doesn't deal with what is really happening in this City. I would refer you to Page 148, the second sentence in the first full paragraph: This could encourage similar development on lots. I think that is an understatement. This, as a precedent north of Washington Street, will be substantial, and displacement will occur." (Sue Hestor, SFRG)

Response

The second paragraph on p. 148 was not quoted fully by the commenter and is taken out of context of the entire paragraph which explains the growth inducing impacts of the project in the site vicinity and in relation to downtown San Francisco. The entire paragraph is reproduced here: "If marketed successfully, the project could have growth-inducing effects in and around North Beach and Chinatown by demonstrating a market for office space in this area. This could thereby encourage similar developments on lots (including smaller lots assembled for development) currently occupied by low-rise and mid-rise buildings containing retail and residential uses. The interim controls and proposed zoning changes for Chinatown and North Beach could limit development of the project vicinity. The demand for office space reflects the trend of growth in service sector and headquarters office activities and employment in San Francisco. Increases in office space and employment would contribute to continued growth of local and regional markets for housing, goods, and services. These growth-inducing effects would be less extensive if the vacancy rate for office space remains relatively high. Should this occur, projected increases in downtown employment would be less and the growth in demand for goods, services and housing would be lower."

Comment

"P. 138. The Committee felt the third sentence of Housing Market Implications was not accurate. Rather than being a precedent, the project represents a unique problematical situation, out of which a citizens' committee, working with City staff, has diligently sought to create new housing opportunity." (Rolland Lowe, CAC)

Response

The comment is acknowledged. The third sentence on p. 138 of the EIR is deleted.

CUMULATIVE IMPACT ANALYSIS AND DOWNTOWN PLAN ENVIRONMENTAL
IMPACT REPORT

Comment

"This EIR should include a section (perhaps in the summary) where all the cumulative impact issues (transportation, housing, air quality, etc.) from development in San Francisco are discussed together. As currently written the cumulative impacts are spread-out through the EIR and it would be more helpful if they were together in one paragraph, even in a summarized form." (Georgia Brittan, SFRG)

Response

This EIR and other project EIRs in San Francisco are organized by topic. Impacts caused by the project alone are discussed first and the impacts resulting from cumulative development (of which the project is a part) follow immediately. By discussing project-specific and cumulative impacts on any given topic in close proximity, it is possible to avoid repetitive descriptions of methodology. This format also helps the decision-makers and the public understand the relationships between the impacts of the project and those of cumulative development – the project's impacts can be compared to those of cumulative development, both quantitatively and qualitatively. Environmental impacts of the project which are analyzed in the EIR from a cumulative perspective include: Transportation (Regional Cumulative Impacts, pp. 111 to 124); Air Quality (primarily effects resulting from cumulative transportation effects) on pp. 129 to 133; Cumulative Employment on pp. 135; and Housing (Cumulative and indirect Effects) pp. 138 to 146 of the EIR.

Significant or potentially significant impacts, including cumulative impacts are discussed in the Summary (Chapter I) of the EIR. They are arranged by topic for the reasons listed above.

USE OF DOWNTOWN PLAN EIR

Comments

"The following articles, which include the Mayor's letter to the Board of Supervisors and the chart referenced above, are background information for the comments in Section IV above. These articles show a high vacancy rate at the same time as the demand for office space continues. There is apparently a great deal of activity in leasing because rents are so low compared with the recent past. Other articles attached discuss the situation with funding for transit and the dark clouds on the horizon as far as availability for funds is concerned. Other articles discuss the increasing traffic on the Bay Bridge and decreasing ridership on BART. The article on evictions shows one of the problems of obtaining affordable housing and ties in to the issue of too many unaffordable condos and too much office space from the past six years.

"I. INTRODUCTION The Section on Regional Cumulative Impacts starting on page 111 of the Draft EIR for the I-Hotel project summarizes the Downtown Plan EIR method of analysis. SFRG believes the analysis in the Downtown Plan EIR used in this Draft EIR is improper. This is because the DTP EIR fails to adequately disclose the magnitude of the adverse impacts which will result from the additional workers which the SEIR [sic] forecasts to be employed in San Francisco between 1984 and 2000. The DTP EIR underestimates by 50% the transit impacts of office development and employment in the non-C-3 area of Downtown San Francisco. By incorporating the transportation sections from the DTP EIR, the I-Hotel Draft EIR commits the same error and is not following CEQA.

"SFRG has noted substantial errors in the DTP EIR impact analyses which result in an underestimation of cumulative impacts on transit and transportation systems. For instance, SFRG has stated that the number of additional riders forecast to be on transit systems is unreasonably low. It is inconceivable to SFRG that there could be so few additional transit riders given the magnitude of additional workers and non-workers forecast to travel during the peak-period P.M. rush hour.

"Not only has SFRG noted these errors during the public discussion of the DTP EIR at the Planning Commission and at the Board of Supervisors prior to the EIR's adoption in August

of 1985, but the same errors in EIRs and SEIRs published by the Department of City Planning from late 1984 through 1986 have elicited SFRG's comments.

"(In the comments below SFRG refers to the 201 Spear Street Supplemental Environmental Impact Report (SEIR) EE#80.377. Two [sic] tables from the SEIR are used in the comments. These are Table 2 [sic, Table 3; info is identical to Table 5 in Pan Magna EIR] and Table 3. These tables have the same information as Table IV.E.1 and Table IV.E.2 respectively from the DTP EIR.)

"In this process of comments from SFRG, the Department of City Planning, author of the Downtown Plan EIR and this EIR, has responded with volumes of discussion on transit impact methodology, computer modelling and calibration, C-3 zoned versus non-C-3 zoned transit assumption, etc. SFRG has stated that it does not particularly care how the Department arrived at its numbers, but it cares whether the end result seems reasonable. CEQA's litmus test is whether the EIR analyses are reasonable, not whether they are complicated.

"The dialogue between SFRG and the Department has been very confusing for decision makers. SFRG asks a specific set of questions, and the Department responses to these comments further diffuse rather than focus the issue.

"In order to bring clarity to this issue, SFRG will first note those critical areas where SFRG and the Department agree, and then discuss where there is disagreement.

"SFRG will prove the following: "The Downtown Plan EIR economic based methodology underestimates the adverse impact of San Francisco employment growth from 19084 to 2000. SFRG's discussion will concentrate on transit impacts to illustrate this problem.

"II. THE DOWNTOWN PLAN EIR ECONOMIC BASED METHODOLOGY UNDERESTIMATES THE ADVERSE IMPACT OF SAN FRANCISCO EMPLOYMENT GROWTH FROM 1984 TO 2000.

"A. CRITICAL AREAS OF THE DTP EIR IMPACT ANALYSIS WHERE SFRG AND THE DEPARTMENT AGREE.

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"In order to focus discussion on these areas where SFRG and the Department disagree, SFRG will first identify those areas where there is agreement. To facilitate brevity, each of these areas of agreement will be discussed in one or two sentences. However, in case documentation is needed to substantiate SFRG and Department agreement of the facts enumerated below, each discussion references a Table which can be consulted as a reference.

"The DPT EIR's discussion of future Citywide employment divides the City into three areas. (See SP-1 [Attachment I of this document])

- (1) The C-3 zones area of Downtown San Francisco.
- (2) The Non-C-3 zoned area of Downtown San Francisco.
- (3) The remaining Non-C-3 area of San Francisco.

"The DTP EIR states that, of the Citywide employment increase between 1984 and 2000, approximately 50% will occur in the C-3 District, approximately 25% will occur in the Downtown non-C-3 District surrounding the C-3 District, and approximately 25% will occur in the rest of the City. (See SP-1 [Attachment I of this document])

"The DTP EIR forecasts that there were 280,860 employees in the C-3 district in 1984 and there will be an additional 91,260 C-3 employees between 1984 and 2000. (See SP-2 [Attachment I of this document])

"The DTP EIR states that about 70% of the C-3 workers travel outbound from the C-3 District during the 2-hour Peak-Period PM commute. (See SP-3 [Attachment I of this document])

"The DTP EIR indicates that approximately 60% of C-3 workers used transit as their mode of transportation in 1984, and approximately 62.4% of C-3 workers will use transit as their mode of transportation in 2000. (See SP-5 [Attachment I of this document])

"DTP EIR Table J.3, J.4, and IV.E.1 all summarizes the P.M. Peak-Period and/or P.M. Peak-Hour transit Person-Trips-Ends (PTE) from the C-3 area and all:

- (1) have identical numbers.
- (2) contain only C-3 transit demand and contain no non-C-3 component.

(See SP-6 and SP-7 [Attachment I of this document])

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"Each C-3 worker who crosses into the C-3 area on transit has one inbound PTE in the morning coming to the C-3 area and one outbound PTE in the evening departing from the C-3 area. (See SP-8 [Attachment I of this document])

"DTP EIR Table IV.E.2 summarize the P.M. Peak-Period and/or Peak-Hour transit demand on each transit system and both:

- (1) show outbound rider demand only.
- (2) include all transit demand; this includes C-3 work and non-work related trips and non-C-3 work and non-work related trips. (See SP-9 [Attachment I of this document])

"For DTP EIR Table IV.E.2 showing outbound transit demand for each transit system, the Department states it is impossible to determine whether the origin of trips is from the C-3 or non-C-3 area. The Tables reflect all transit demand from all areas and sources regardless of origin. (See SP-10 [Attachment I of this document])

"The travel characteristics for downtown San Francisco non-C-3 area employees which are in close proximity to the C-3 area are approximately the same as for C-3 workers. (See SP-11 [See Attachment I of this document])

"SFRG will use the above facts to substantiate its comments. Most of the facts need no further elaboration than given in the referenced tables. However, it is useful to briefly reiterate the definition of some of the terms cited above since they are use extensively hereafter.

"Person-Trip-End - A person-trip-end (PTE) is a one-way trip of a person from departure point to a destination. The trip may be walking, transit, dining [sic], etc. A worker will have at least two PTE per day, one PTE to work in the morning and one PTE from work in the evening. One transit PTE occurs when a person takes a one-way trip on transit.

"C-3 Boundary - The boundary of the C-3 zoned area shown in Figure IV.E.1 of the Downtown Plan EIR.

"Regional Transit Screenlines - There are boundaries chosen to measure outbound transit demand for various transit and transportation systems as shown in DTP EIR Figure IV.E.1.

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These lines may or many [sic] not coincide with the C-3 boundary, depending of the transit system.

"C-3 District PTE - This is a PTE to destinations or from origins in the C-3 District. It is measured at the C-3 Boundary

"C-3 District PTE P.M. Peak Period (or Hour) PTE by Mode - This is the PTE on various modes of transportation. These PTE by mode are summarized in the DTP EIR Tables J.3, J.4 and IV.E.1 of the SEIR. C-3 district peak-period (and hour) transit from the C-3 area alone is included in these Tables. These are measured at the C-3 boundary.

"Outbound P.M. Peak Period (or Hour) Transit Demand by Mode - This is outbound transit demand from all sources and areas including C-3 District, non-C-3 district, work and non-work. This is summarized in DTP EIR Table IV.E.2. These are measured at Regional Screenlines.

"SFRG will develop its case that the DTP EIR fails to adequately portray the magnitude of future transit impacts associated with San Francisco employment growth. (Georgia Brittan, SFRG)

"One of the problems that is a consistent problem that goes beyond the problems with the cumulative impact analysis is that it's getting difficult to understand how the Department is using the Downtown Plan EIR in other EIR's. It becomes a shorthand which the drafters of the EIR and the department staff know what they're talking about, I hope, but it's very difficult for public, members of the public who would come at this without an intensive background in the Downtown Plan EIR to understand how the Downtown Plan EIR is being used. It's used for a lot of things. It's used for a lot of assumptions as well as for the cumulative impact analysis." (Sue Hestor, SFRG)

Response

As noted in the comment, the comments received on cumulative impacts analysis and the use of the Downtown Plan EIR analysis in this EIR build on the comments, and the responses to comments, on the Downtown Plan EIR (both before the Planning Commission and the Board of Supervisors), the comments and responses to comments on other EIRs for downtown projects and court arguments on Downtown EIRs.

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All or portions of several background documents are summarized and incorporated by reference in the following responses concerning cumulative impacts and the Downtown Plan EIR cumulative impact methodology. These documents are available in the project file. They are:

The Downtown Plan EIR, File EE.81, Certified October 18, 1984 Transportation Analysis for the Downtown Plan EIR, Supplemental Materials, October 17, 1984.

March 5, 1985 letter to the Planning Housing and Development Committee of the Board of Supervisors from the Department of City Planning.

Downtown Plan EIR Forecasts and Non-C-3 Analysis, presented to the Planning, Housing and Development Committee of the Board of Supervisors by the City Planning Department, March 19, 1985.

May 7, 1985 letter to the Planning Housing and Development Committee of the Board of Supervisors from the Department of City Planning.

201 Spear Supplement EIR, File EE80337, Certified Nov. 14, 1985. The comments on cumulative impact analysis include a series of specific references to tables containing transportation information, which have been presented in the Downtown Plan EIR, and subsequently in a number of other Downtown EIRs. While the description of the Downtown Plan EIR tables, and similar tables in the 201 Spear SEIR is basically accurate, the statement that Table 2 from the 201 Spear SEIR, and Table 5 (p. 114) in the Pan Magna Plaza EIR are identical is not correct. Table 5 in the Pan Magna EIR describes total outbound transit demand during the peak period and peak hours. The information in Table 5 is from Table IV.E.2 of the Downtown Plan EIR. The information referred to in the comment, that contained in Table IV.E.1 of the Downtown Plan EIR and in Table 2 from the 201 Spear SEIR, concerning C-3 district total person trip ends by mode in the p.m. peak hour and period, does not appear in the Pan Magna Plaza EIR, primarily because, as a non-C-3 project, Pan Magna Plaza would not contribute to these totals. Instead, the total cumulative impacts of downtown growth on the transportation systems are

discussed. Impacts on transit are shown in Table 5, impacts on representative intersections are described in pages 99 to 120, impacts on freeway traffic are described in pages 121-124. Consequently, when reference is made to Table 5 of the Pan Magna Plaza EIR in the comment, the reader should understand that the specific information being used will not be found in that Table, but can be found in Table IV.E.1 of the Downtown Plan EIR, and is an underlying assumption of the total cumulative transportation impacts described in the Pan Magna Plaza EIR on the pages listed above. The fact that the table references are wrong in the comment does not alter the fundamental arguments being presented. The Responses respond to these fundamental arguments rather than to the precise points made in relation to Table 5.

The agreement on specific points between the commenter and the Department of City Planning described in the comment is not total. Although the points of disagreement may not seem critical, they can be important at a later stage in the discussion. As will be discussed later in this document, the forecasts of C-3 district employment were prepared in quite a bit of detail while the estimates of employment outside of the C-3 district are just that -- estimates. The estimates do not account for restrictions on growth such as the North of Market rezoning, the South of Market permanent controls or the Citywide limit on office space approvals. This difference in the specificity of the employment figures used throughout these comments sheds additional doubt on many of the conclusions reached in the comments.

DOWNTOWN PLAN EIR ASSUMPTIONS

Comments

"Please explain the context of development for this project. What is the amount of development that will occur within the next five years, within the next 10 years, by the year 2000? What were the assumptions used to determine this amount of development. How could the assumptions used to determine the amount of development be wrong or misleading? What would be the result if they were wrong? If they were too high? If they were too low? (Please see section below on 10 assumptions from the Downtown Plan EIR).

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"These projections from the Downtown Plan EIR are based on 1981/82 data. These projections contain several key assumptions. The assumptions from the Downtown Plan EIR [as interpreted by SFRG] are underlined. The remainder of each paragraph is background.

"1. The rate of office development will slow compared with the rate from over the last five years because of decreased demand for office space. This decrease in demand is due to the large amount of office space to become available for occupancy in the next few years. Many potential tenants for office space have relocated from San Francisco's C-3. Developers will not lower rents in order to gain tenants for their new projects.

"2. Development will also be at a lower rate than in recent past years because the Downtown Plan zoning attempts to shift the 'center' of the C-3 away from the Montgomery/California intersection to the area around the Transbay Terminal. It will take time for the 'market' to adapt to this change.

"3. More people will be on the transit systems because they will have switched from driving their cars to public transportation. This modal shift is expected to not overburden transit. This modal shift will 'alleviate' the problems of too much traffic on the bridges and highways into San Francisco.

"4. Traffic on the Bay Bridge is not getting worse. Traffic has not increased over the past several years. This is due in part to more people per car.

"6. Traffic on the Streets of San Francisco has maintained the same conditions as 1947 levels. Traffic conditions will not become intolerable in San Francisco and the intersections will allow for movement of cars, trucks and busses in the commute periods.

"7. AC Transit lines from the East Bay (which terminate in the Transbay Terminal) will not see a major increase in ridership. There will be no major increase in ridership on AC Transit because they will not be getting any more vehicles.

"8. The East Bay communities, particularly those communities along Highway 80 and 17 will be the major suppliers of housing for San Francisco workers. These cities have the greater increase in C-3 workers.

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"9. Transit is based on the 5 year plans of the Transit Agencies (1983-88). Monies from the Federal and State Governments will be available to aid with the financing of those projects vital to 'keep-up' with the impacts of new workers in San Francisco C-3.

"10. San Francisco will produce 600 to 1500 units of housing per year between 1984 and 2000. In the past two years (1983 and 1984) there have been 1,876 net new units in San Francisco. 1,164 of these (total) 2,190 units were condos (62%) and are for owner occupancy. Approximately 66% of the City's residents are renter occupied. What is the affordability factor of the units produced in these two years. There is a large number of condo units over the past two years and this usually means "expensive housing." What is the effect of units being built only not to be occupied because most of the City's residents cannot afford these units?

"Please explain why the Downtown Plan EIR has made these assumptions. Please explain how these assumptions which were made based on 1981/82 data match up with the current situation. (Please note the enclosed articles that show decreasing ridership on BART and Golden Gate Transit and show greater numbers on the Bay Bridge (SF Chronicle 2/14/86, SF Chronicle 2/10/86, SF Examiner 1/14/86 [see Attachment II of this document])). Please note the problems in the region (SF Chronicle 1/30/86 [see Attachment II of this document])).)

"Please explain how these articles, which discuss environmental impacts in 1986, match the assumptions in the Downtown Plan EIR. Please discuss why the 'background' in each paragraph is correct or incorrect and what that means for the assumption.

"Please include a statistic on the number of units added to San Francisco's housing stock for 1985 and the tenure. Please add the cost of this new housing as well as cost of housing in the past few years. In other words, how much does it cost to buy a condominium in San Francisco? What is the current vacancy rate in condominiums around the City?

"Please discuss the current situation in the East Bay for housing summarizing increase in prices, new housing stock and gentrification." (Georgia Brittan, SFRG)

Response

The development context requested by the comments is provided in the Setting and Impact sections of the EIR. Without a more specific comment, a more specific response is not possible.

Introduction

It is important to understand the long-term nature of the cumulative analysis of growth over time. The cumulative analysis in the Downtown Plan EIR addresses growth through the year 2000. It provides forecasts of the amount and types of growth expected to occur and assesses the impacts of that growth in several subject areas (transportation, air quality, energy, etc.).

The forecasts of growth are considered to be long-term forecasts in that they focus on the amount and types of growth expected during the study period. Detailed forecasts for specific years during the study period were not prepared except for 1990 as an interim benchmark. No attempt was made to forecast economic growth on an annual or short-term basis. Such forecasts would be very difficult to prepare since the economy experiences numerous short-term cycles which, together, make up the long-term pattern. For example, employment might grow at one or two percent per year over a 15- or 20-year period. During that period, there could be years when employment grows at a higher than average rate and years with growth at a lower than average rate or with no growth at all. In other words, the smooth curve of the long-term pattern includes a number of shorter-term ups and downs which average out over time.

The same perspective applies for the questions about future demographic, housing, and transportation characteristics. In fact, the patterns in these areas are more long term, in the sense that they are more evolutionary, dependent on broad ranging demographic and social factors (such as the age distribution of the population, the propensity of women to work, and lifestyle preferences). These characteristics are more difficult to monitor since they involve region-wide patterns and much of the needed data is available only from the U.S. Census done every ten years.

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Most of the comments in this section attempt to make comparisons between current conditions and the longer-term forecasts and analyses. What this involves is actually a comparison of recent, short-term conditions to the expected, long-term pattern. Such a comparison could indicate that the short-term pattern appears similar to that forecast for the long term. It could also indicate differences. Initially, these differences would be merely that: differences between short-term trends and the long-term average pattern. Differences would not necessarily signal that the long-term forecasts should be changed. Rather, they would indicate that the forecasts should continue to be monitored until enough time has elapsed to indicate whether the longer-term trend appears different from what had been expected.

The amount of time needed to indicate that long-term forecasts should be revised if differences continue to exist, depends on the factors involved in causing the differences, the degree of difference, the frequency with which data are available for monitoring, and the extent that various indicators are all showing a consistent pattern. Thus, it is difficult to generalize.

To date, no new data or information are available that would indicate that the long-term forecasts prepared for the Downtown Plan scenario are substantially off-target or misleading as alleged. Not enough time has passed to evaluate whether or not the assumptions and analytical conclusions used to prepare the long-term growth forecasts should be revised. Major changes in the types of behavior that are forecast (housing choices, modes of travel to work, business location decisions and real estate market conditions) occur gradually over time. The long-term pattern is the key element. The Downtown Plan EIR forecasting methodology could result in forecasts that are either too high or too low, when compared to actual conditions during, or at the end of, the forecast period. This is part of the definition of forecasting; the procedure represents a "best guess" of the most likely future outcome. If growth occurs later than anticipated, then the forecasts are too high, and the impacts would be overestimated for the particular period of study.

While recent Citywide employment statistics provide an indication that employment growth has been lower than the forecast average pattern would predict (if the

economy operated in a regular pattern), it is possible that future growth could occur at a higher rate, thereby returning to the longer-term pattern that was forecast. However, it is possible that continued slower growth through 1987 and into 1988 could signal that the estimates for the 1990 benchmark year should be revised downward and that impacts were overestimated. This still would not necessarily indicate that the forecasts for 2000 should be revised as well.

There is no one single set of "assumptions" in the Downtown Plan EIR growth analysis. There is a forecasting methodology, which includes assumptions, extensive data and information, and analytical procedures leading to certain conclusions. This forecasting methodology was used to develop employment growth and real estate development scenarios for the Downtown Plan and the five Alternatives. The methodology and assumptions are not described in detail in this EIR since they are explained in the Downtown Plan EIR. Detailed explanations of the growth forecast methodologies can be found in Section IV.B of the Downtown Plan EIR, in Volume II, Appendices G and H, and further explained in Responses to Comments Section B, particularly Subsections B.1 and B.2, pp C&R-B.1 to B.18. The Responses outline and summarize the data sources used and the forecast approach. The Responses also compare the forecast results to other projections and forecasts, noting that the Downtown Plan EIR forecast is considerably higher than that prepared by the Association of Bay Area Governments.

A list of the major data sources used in preparing the economic forecasts of land use, real estate development and employment appears on pp. C&R-B.2 to -B.3 in the Downtown Plan EIR Comments and Responses. This list includes the most current relevant sources available at the time. In addition, the residence patterns and housing analysis used 1960, 1970 and 1980 Census data, as well as special reports and inventories related to San Francisco housing and changes in the housing stock. For many of these sources updates do not exist.

The assumptions and forecasts used in the Downtown Plan EIR have been reviewed and continue to be valid and appropriate for an environmental assessment of future cumulative effects of downtown growth over the next 15 years. Insofar as the forecasts may have overestimated growth as noted in the Downtown Plan EIR Responses, impacts have been overstated (see pp. C&R-B.10 and B.18).

Assumptions of the Downtown Plan EIR

Before the detailed response to the commenters' list of Downtown Plan EIR "assumptions," it is necessary to explain that the use of the word "assumption" is not correct, to the extent that it implies something taken for granted. What are referred to in the comments as assumptions of the Downtown Plan EIR are often more appropriately labeled "conclusions" of the analyses undertaken to establish the forecasts and complete the impact assessment. The conclusions are based on data analysis and the synthesis of many pieces of information; there is an analytical rationale for these statements.

The "assumptions" presented in the comments above do not all reflect conclusions and data used in the Downtown Plan EIR analyses, and the "assumptions" presented are not in all cases the bases for discussion presented with a particular assumption in the comments. For example, the point is made in the Downtown Plan EIR that it will take time for office development to shift from the North of Market Street Financial District to the Special Development District in the eastern South of Market area (SFRG item 2) (see Downtown Plan EIR pp. IV.B.36 to B.39). That is one of the bases for the overall employment/space forecasts which show that development in the downtown core will grow at a rate approximately that of the previous 15 years and will not sustain the high short-term rate of the 1980-84 period (see Downtown Plan EIR pp. C&R-B.5 to B.7 and B.8 for a brief discussion of these issues).

Another example is the discussion accompanying point #3 in the comment. It is accurate to state that the Downtown Plan EIR assumed, based on professional judgment, that there would be a modal shift from drive alone to transit and carpooling (the latter was not stated in the comment but is an important point in the Downtown Plan EIR analysis). The discussion implies that all "excess" auto travelers were shifted to transit with no effects on transit systems. On the contrary, mode shifts to transit were made only to the extent that consulting transportation engineers and agency staff thought reasonable within the expected capacities of the various transit systems. Remaining travelers were "left in their autos" and were counted as "excess demand" on the freeway systems insofar as the auto traffic could not be accommodated within the existing freeway capacities (new freeway capacity

was not assumed in the Downtown Plan EIR). This is described in the Downtown Plan EIR on pp. IV.E.30 to E.36 and comments on this point are responded to on C&R-E.54 to 55 (see also pp. C&R 9-15 regarding mode shift). The Downtown Plan EIR analysis does not attempt to "alleviate" freeway congestion by loading all travelers on to transit nor does it assume decreases in vehicular traffic.

The Downtown Plan EIR did not assume that traffic in San Francisco has been the same since 1947 (Comment, item 6). As shown in the Downtown Plan EIR Responses, traffic from the greater downtown has decreased slightly between 1965 and 1983, during a time when office space in downtown grew by nearly 100% (pp. C&R-E.9 to E.11). The Downtown Plan EIR does note that intersections near freeway ramps are likely to become more congested in the future if mitigation measures are not implemented (pp. IV.E.33 to E.35 and Figure IV.E.3, p. IV.E.38).

The Downtown Plan EIR did not assume that East Bay communities would be the "major" supplier of housing for San Francisco workers in the future (Comment, item 8). It was assumed that there would be some increase in the proportion of downtown core workers housed in the East Bay, as that part of the Bay region has relatively more land available for housing development and better transit facilities leading to downtown San Francisco (among other reasons) and based on ABAG forecasts of housing availability. However, downtown core San Francisco workers are a relatively small percent (about 8% to 10% for East Bay counties in the year 2000, compared to 7% to 9.5% in 1980-81) of the total employed population in counties outside San Francisco (see Responses pp. C&R-D.42 to 43 and Table C&R-D.4, p. C&R-D.44).

The Downtown Plan EIR does assume that housing will be added in San Francisco in a range of about 600 to 1,500 units per year on average (Comment, item 10). (See Responses pp. C&R-D.11 to D.14.) As noted in the comment above, the City's production in recent years (1983 and 1984) has averaged about 940 per year. 1985 figures show an addition of about 1,400 units to the housing stock. Thus, the Downtown Plan EIR assumption was reasonable and remains so.

Clearly all of these points have been raised as part of the discussion on the Downtown Plan EIR and responses have been provided and are part of this project EIR by virtue of incorporation by reference. No new issues have been raised. The newspaper articles referenced in the comment largely confirm the assumptions made in the Downtown Plan EIR.

The newspaper reports of high vacancy rates for office space are describing the current short-term business cycle that is the other side of the extremely low vacancy rate seen in the early 1980's and the accompanying high rate of building activity. These high and low vacancy rates are expected components of the longer term picture looked at as part of the forecast of downtown growth to the year 2000. These short-term fluctuations were anticipated in the forecast and were part of the basis for the statement in the Downtown Plan EIR that the vacancy rate would be relatively high in 1990 and that some of the space approved in the mid-late 1980s would not be absorbed by 1990 (see Downtown Plan EIR Vol. I, pp. IV.B.23 to B.29; Vol. III, Part 1, pp C&R-B.10 to B.11). As noted above, if the forecast of growth is determined to be too high, then impacts shown in the Downtown Plan EIR would be overestimated.

The transit ridership dip shown by BART in January 1986, is also part of a balanced cycle that occurs between transit and auto commuting when fares increase: some riders initially shift to auto, traffic congestion increases, and then some drivers shift to transit. That, too, was accounted for in the Downtown Plan EIR analyses and was one of the bases for the mode shift assumptions which did not include an assumption that all goals for the proportion of commuters using transit would be met.

Increases in Bay Bridge traffic have occurred due to vehicular travel during times other than peak periods as well as during the peak periods, as noted in the cited San Francisco Chronicle article (January 14, 1986). That is, the Bridge has operated at capacity during the 11:00 a.m. to 1:00 p.m. period, a time unrelated to downtown worker commuting. This article confirms the Downtown Plan EIR assumption that the Bridge has been operating at capacity during the a.m. and p.m. peak hours for many years and that carpooling continues to increase. Another article included with the comment ("Bay Area Growth is Off-Course") discusses the problems of increased traffic in East Bay areas such as the I-580/I-680 corridor. This article points out

the problems of spreading major office employment centers throughout the region rather than concentrating employment in centers where large amounts of public transit are available. This precise point was addressed in the Downtown Plan EIR Responses on p. C&R-E.56.

The assumptions in the Downtown Plan EIR that appear to have been questioned in the comment remain valid. The issues raised were, in most cases, discussed in the Downtown Plan EIR, often in response to comments received in 1984. The long-term forecasts and projections used in the analyses for the Downtown Plan EIR accounted for short-term fluctuations, and the analysis remains current.

As stated in the commenter's summary statement item 10 in SFRG's "Assumptions of the Downtown Plan EIR," [p. C&R 121] San Francisco is expected to produce 600 to 1,500 units of housing per year between 1984 and 2000. In 1983-1984, 1,876 net new housing units were added to the San Francisco housing supply; 1,164 of these units were condominiums (62%). Housing production was thus about 940 units per year for 1983-1984. The commenter's assumption/background item 10 concludes by citing (and interpreting incorrectly) a statistic from the 1980 Census. According to the 1980 Census, 66% of the City's occupied housing units are renter occupied. This is not the same as saying 66% of residents are renters. In any case, it is true that a majority of the City's residents are renters.

According to Department of City Planning preliminary study for the Annual Housing Inventory Report, data show that housing completions have increased to about 1,000 units per year, with close to 1,400 units authorized for construction by the Bureau of Building Inspection in 1985. The reported data for these years, 1983-1985, fall within the Downtown Plan EIR forecast of 600 to 1,500 units per year on average.

The commenters, in their assumptions/background item 10, present some data related to condominium units, although the relevance of the cost of condominium units to this project is not made clear. The Housing Information Series report for 1983-1984 does show a total of 1,164 condominium units completed. (See Table 20 on p. 40 and Table 20 on p. 68 of the July 1985 report; changes in the San Francisco Housing Inventory 1983-1984.) The comment incorrectly presents this estimate as a

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percentage of net additional units. The data on condominiums are not a subset of the data on net additional units. The condominium completions can be compared to total housing unit completions, however; for 1983-1984, this total is 2,190 units. (See Table 14 on p. 32 and Table 14 on p. 60 of the above-noted report. This is more than the net additions of units because it does not account for demolitions.) The condominiums completed during this period are 53% of total completions.

Not all condominiums are owner-occupied. Some are purchased by investors and are subsequently occupied as rental units. In fact, this type of purchase/rental has been an important factor in San Francisco's and the Bay Area's condominium market.

The Downtown Plan EIR housing scenarios make no explicit assumptions about the distribution of new units by tenure. The Downtown Plan EIR Impact section acknowledges the particular difficulties of producing rental housing in San Francisco. The discussion of impacts describes a housing scenario in which those with the least financial resources would be likely to bear the burden of the negative housing market implications. This group includes many renters. (See Downtown Plan EIR, Vol. 1, pp. IV.D.80 to D.81e and Vol. 3, p. C&R-D.65 which specifically addresses the question of future rental housing in the City, and gentrification).

The housing production data sources referred to in this response reflect the most recent data available. Further information specific to condominiums such as price appreciation data is not available. Condominiums are a relatively small portion of San Francisco's overall housing market which includes existing and new housing.

The second comment requests detailed information on the East Bay housing market: "increase in prices, new housing stock, and gentrification." This request presupposes a more detailed study of the East Bay housing market than required for the cumulative analysis of downtown San Francisco growth. The setting describes overall conditions, mentioning home price appreciation, vacancy rates, and the factors influencing the production of new housing in the Bay Area. This discussion has been updated with the most recent data available (beginning on p. 49 of the

EIR). The setting also describes the "gentrification" pressures on the existing stock. This level of detail for the setting provides the appropriate background for the discussion of impacts, where future housing market conditions are not quantified but the types of effects and the groups of people affected are identified.

Current data available to date do not provide a basis for adjusting either the forecasts or impact assessments presented in the Downtown Plan EIR or this EIR.

As background for the comments addressed by this response, there are several aspects of the cumulative housing analysis from the Downtown Plan EIR that should be understood. These provide perspective for considering the implications of more constrained residential development policies in the suburbs. They indicate that the relationship between the growth of employment and additional housing units is not as simple and direct as it often assumed.

The cumulative housing analysis does not assume that the additional downtown workers residing outside of San Francisco in the future will necessarily occupy the new housing built in the region, particularly that developed in outlying communities. Rather, it is expected that many of these additional workers will reside in existing and new housing in the relatively closer-in communities of the region. Downtown workers will tend toward locations that are relatively more accessible to downtown San Francisco than locations that are distant or highly inaccessible to the City. Those who end up at the periphery will tend to be households with persons who work in outlying areas or in the middle tier of the region, rather than in the center. There is a dynamic pattern of housing occupancy which occurs over time as people move in and out of the region and others change housing within the region for a variety of reasons (e.g., proximity to places of work as well as preferences for various types of prices/rents of units).

Comment

"Please include an update on all sources of funding from both the Federal and State Governments for transit projects in the Bay Area. Please include a status report on the

progress the MUNI Metro Turnaround is making. This is 1986: are the five year plans (1983-88) used in the Downtown Plan EIR on target? If they are off-schedule please discuss by what amount of time they are off-schedule and the likelihood for completion of the five-year plan by 1988. Enclosed is a copy of the Mayor's February 13, 1986 letter to the Board of Supervisors. Please note the attached chart which shows the potential impact that the MAYOR BELIEVES President Reagan's budget will have on San Francisco.

"Please discuss the impact on ridership on increasing transit fares (including potential fare increases above those recently imposed by MUNI and BART) and the decrease in the price of gasoline. Is there a relationship between increased fares and lower prices at the pump. Please include in the comments what was the Downtown Plan EIR assumption for lower gasoline prices vis-a-vis higher transit fares. Please discuss the likelihood of an increase in ridership on the AC Transit lines from the East Bay which drop-off passengers adjacent to the area the Downtown Plan has slated for the most intense development (the area in which this project is located [sic].)" (Georgia Brittan, SFRG)

Response

Given the current political climate, it is unrealistic to expect increased transportation funding from the Federal or State governments. Although Muni funding is stable through the next fiscal year, Muni is in the process of developing contingency plans to deal with losses in revenue due to budget cuts. Exactly what these measures will be is not known at this time. Muni anticipates increasing efficiency through administrative and operational changes and accommodating growth by increasing capacity without increasing personnel (i.e. by replacing standard buses with articulated buses). The Board of Supervisors and P.U.C. would have to approve any changes in service or fare increases.

The Downtown Plan EIR did not make any assumptions regarding gasoline prices, transit fares, and transit ridership. The relationship between these three factors is complex. There are many other factors that are involved in choice of transportation modes. Personal convenience, parking, number of transfers, distance from home to transit, and hour of travel are examples of factors influencing transportation choices. There is no known correlation between the price of gasoline or transit

fares to transit ridership. Historically, gasoline prices have either been stable or increasing and thus, there has never been an opportunity to study the relationship between transit fares, transit ridership, and decreasing gasoline prices. One of the bases for the mode shift assumptions in the Downtown Plan EIR was a balanced cycle that occurs between transit and auto commuting when fares are increased (see also response to comment beginning on p. 297).

The Muni Metro turnaround at the Embarcadero was not assumed to be completed in the transportation impacts analysis in the Downtown Plan EIR. Instead, it was considered as a potential mitigation of the impacts which were forecast. Therefore, a lack of progress of this project would not increase the impacts described in the Downtown Plan EIR or this project EIR. If the turnaround is not completed before 2000, the assumptions underlying the impact analysis, which were designed to be conservative, will be correct. If it is completed, the impacts would be somewhat mitigated. For a more detailed discussion of the Muni Metro Turnaround, and how its construction would affect the transportation impacts forecast in the Downtown Plan EIR, see Downtown Plan EIR Vol. III, Responses to Comments, pp. C&R-E.64 to 66.

The Muni Metro turnaround is currently in the preliminary engineering phase. Environmental assessment for the Federal Environmental Impact Statement (EIS) is also being conducted at the same time as the engineering analysis to allow necessary design adjustments. The preliminary engineering work is behind schedule because of extra analytical tasks (e.g., the China Basin extension) that have been added. However, the results of these analyses may lead to a preferred design alternative that could reduce the time needed for the later phases (final engineering design and construction). Due to the uncertainty of these results, an exact schedule of the remaining phase is not possible at this time. However, late 1990 (the date assumed in the Downtown Plan EIR) is a feasible completion date.^{1/} The Muni Short-Range Transit Plan 1986-1991 projects that the final phase of the Muni Metro turnaround will be completed in March 1990.

Funding for the phases beyond the preliminary engineering and EIS work is not as yet in-hand; however, the Muni Metro turnaround is the second highest transit priority in the Bay Area, behind the Daily City BART turnback, according to MTC.

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The Downtown Plan did not assume all capacity increases in the Five-Year Plans but rather assumed limited transit capacity increases, largely only those capital projects already underway and/or partly or fully funded. (See Downtown Plan EIR Appendix J, pp. J.25 - 26 and Responses to Comments, pp. C&R-E.30 to 34, C&R-E.45 to 46 herein incorporated by reference.) Threatened reductions in federal funding were the basis for comments on the Downtown Plan Draft EIR. Responses were provided at that time (see pp. C&R-E.31 to 34). The issue continues to be current, as federal budget cuts continue to be discussed. While there has been talk of reduced federal funding for transit projects, these threats have been offered each year for several years, without major effect in the Bay Region on the federal grants. It is reasonable to assume some continued federal subsidy in the future. In any case, the Downtown Plan EIR states that some federal funding sources are expected to be discontinued by 1989 (p. J.25). The transit operators are expecting less federal subsidy than in previous years. (For example, Section 9 block grant funding is likely to be \$60 to 65 million rather than \$80 million received in earlier years.)

The Metropolitan Transportation Commission (MTC) now reviews transit agencies' programs for a five-year period and establishes priorities. This Five-Year Regional Transportation Improvement Program reduces financing uncertainties for the various transit agencies.

The San Francisco Municipal Railway expects to be granted its share of these and other funds for projects that were assumed as part of the capacity increases in the Downtown Plan EIR, as well as for many of the projects that were included in the EIR as transit mitigation measures. Examples include the Muni vehicle replacement program, and articulated trolley coaches and accompanying improvements, both of which are included as priority items in MTC's Section 9 program. Other examples of assumed capacity increases that have been funded are the BART Daly City turnback facility, which is now fully funded as noted above, and BART's additional rail cars which are now on order and funded. Thus, the transit agencies' Five-Year Plan, while they continue to be updated, also appear to be on course and are being funded and implemented. While federal funding will continue to be an issue, the Downtown Plan assumptions remain current./1/

The five year plans of the five other transit agencies serving San Francisco are generally proceeding according to schedule with the exception of A.C. Transit, which is facing a deficit. This could cause reductions in service regardless of targets in the five year plan. To what extent the deficit will affect service is not known at this time. (The Downtown Plan EIR assumed that A.C. Transit Transbay Service would not increase over time, but would remain constant at 1984 levels.)

NOTES - Transit

- /1/ Mr. Everett Hintze, project manager, utilities Engineering Bureau of San Francisco Public Utilities Commission, telephone conversation, August 7, 1986.
- /2/ Material regarding transit funding and Five-Year Plans was obtained in telephone conversations with Gail Bloom, PUC Finance, March 31, 1986 and March 4, 1987, Marty Birkenthal, BART, March 28, 1986 and March 4, 1987, and Allen Zahradnik, Golden Gate Transit, March 28, 1986 and Jerome Kykendall on March 14, 1987.

Comment

"p. 105. Please explain how the additional riders from 1984 to 2000 for the peak hour and peak period on BART are accounted for in the Department's tables that appear in the Supplemental Materials for the Downtown Plan, published October 17, 1984. For example for the peak period the table remains at 2300 riders from the non-C-3. There is no increase assumed in this table. However, this EIR for a non-C-3 project shows an increase of 25 riders in the peak period, just as previous EIRs for the non-C-3 have shown an increase in peak period ridership." (Georgia Brittan, SFRG)

Response

The 2,300 non-C-3 BART riders shown in the October 17, 1984 Supplemental Materials are those who enter BART stations outside of the BART screenline (west of the Van Ness station or east of the Embarcadero Station). All BART riders who enter at downtown stations are counted as C-3 riders in that material, even though some of them arrive at those stations from places of employment outside of the C-3 district. Table 4, p. 104 of the EIR shows an increase of 15 BART riders from 1984 to 2000. These commuters would enter BART at the Embarcadero or Montgomery Street stations and would be counted as C-3 district trips in the October 17, 1984 Supplemental Materials.

DOWNTOWN PLAN EIR TRANSPORTATION ANALYSIS

Comments

"B. THE FIRST EXAMPLE CONCERNS WHETHER THE DTP EIR AND SEIR [sic] TABLES SHOWING DOWNTOWN C-3 DISTRICT P.M. PEAK-PERIOD PERSON TRIP ENDS (PTE) FOR 1984 AND 2000 INCLUDE OUTBOUND TRAVELERS OR OUTBOUND AND INBOUND TRAVELERS.

"The following discussion will focus on Department contradictions regarding this matter.

"As shown in Figure SP-6 [See Attachment I of this document], DTP EIR Tables J.3, J.4, IV.E.1 and Table 5 from this EIR, show identical information. These tables show 41,400 additional peak hour PTE and 64,150 additional peak period PTE from 1984 to 2000.

"Footnote (a) in Table J.4 notes that these additional PTE are 'Total peak-period PTE from (emphasis added) the C-3 district.'

"Footnote (b) in Table IV.E.1 notes that these additional PTE are 'Total person-trip-ends (PTE) to destinations or from origins in the C-3 district.'

"Table 2 in the 201 Spear Draft SEIR is entitled 'Comparison of List method and economic forecast method outbound P.M. peak hour cumulative travel demand from C-3 District growth (emphasis added). Footnote (2) for this table stated that this additional PTE was 'Travel from the C-3 district only' (emphasis added).

"Based on the information in this table, (Table 2 of the 201 Spear EIR, Table 5 of this EIR), SFRG subtracted the PTE shown in this table from increased outbound ridership demand shown in Table 3 of the EIR.

"SFRG was strongly rebuked for doing so in the 201 Spear Responses to Comments. The Department chastened SFRG saying that: 'The commenters have subtracted in and outbound travel estimated at the C-3 district boundary (Table 2) from only outbound total travel measure at the screenlines (table 3). The C-3 numbers (in Table 2) are comprised of two travel directions, only one of which is relevant to the outbound total from which

'C-3 travel' is being subtracted. . . . the basic problem with the commenters approach is that they have subtracted the sum of two oranges from one apple... Moreover, the transit systems they have chosen to illustrate the point tend to fall into the group for which some non-C-3 travellers were included in the C-3 portion. . . . 'Exhibit SP-10 is the result of the above noted manipulations, based on Tables 2 and 3 of the SEIR. (p. 107 201 Spear SEIR [See Attachment I of this document])

"In other words, SFRG had the audacity to assume that a Table entitled 'Outbound Travel from the C-3 Area' was precisely that. We, the public, and the decision makers should have known it was really inbound and outbound travel. The Responses to Comments documents then modifies the Draft SEIR by stating: 'To clarify the ambiguity in the SEIR, the word 'outbound' is deleted from the title of Table 2, p. 47 of the SEIR, and the first sentence of note 2 is amended to read (additions underlined): 'Inbound and Outbound travel from the C-3 District only.' (Supra)

"However, at the November 14, 1984 public hearing on the 201 Spear building permit, six days after the above referenced response was published, the Department refuted SFRG testimony by stating that, 'Table J.3 is in fact simply travel from the C-3 district. It doesn't purport to be anything else... you cannot use Table J.3 to reflect anything but travel from the C-3 as it is labeled' (transcript 201 Spear Certification on SEIR, pages 30-31).

"There is clearly confusion in the Department as to what these tables actually show.

"The following discussion will focus on how the Department exaggerated the 'inbound and outbound' versus 'outbound' issue as if it were of vital importance in order to ignore the real issue.

"As noted above in the Responses to Comments, the Department used the alleged fact that 201 Spear Street SEIR Table 2 was inbound and outbound PTE and the fact that Table 3 was outbound ridership to totally refute SFRG's testimony. (Again, the information in Table 5 is from Table IV.E.1 in the DTP EIR and the information in Table 3 is from Table IV.E.2 in the DTP EIR.) They have made an incredible issue of whether Table 2 contains inbound and outbound PTE, and have even contradicted themselves in the process.

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"In reality, it does not really matter. This is because even if DTP EIR Tables J.3, J.4, IV.E.1 and Table 5 do include inbound and outbound C-3 travel, 95% of this travel is outbound during the P.M. Peak-Period.

"Appendix J presumes all of the worker related PTE are outbound during the P.M. Peak-Period, and 50% of the non-worker trips are outbound and 50% are inbound. As noted in SP-8 [See Attachment I of this document], the DTP EIR states on page J.6 that 'each employee has two one-way person-trip-ends for work,' one inbound PTE in the morning and one outbound PTE in the evening. The DTP EIR also states that: 'Although the employee travel in the P.M. peak period has been generated using employee departures as a base (emphasis added), the reference data show that non-work travel is less directionally oriented. The assumption has been made that 50% of the P.M. Peak non-work trips are travelling in a non-commute direction and 50% are travelling in a commute direction.' (p. J.9 DTP EIR)

"Thus each C-3 employee trip is a departure (outbound), while half the non-work trips are outbound and half are inbound. "Therefore, there is a simple answer to the 'inbound and outbound' versus 'outbound' controversy. It can be stated in one sentence: Virtually all worker PTE are outbound during the P.M. peak hour and period and 50% of other travel is outbound.

"Figure SP-12 [See Attachment I of this document] summarizes information from DTP EIR Table IV.E.1. This shows that the work related PTE for the C-3 area increased by 44,890 PTE for all transit systems during the P.M. Peak Period and that non-work PTE increase by 4,800. According to the assumptions of DTP EIR Appendix J, there would be: "44,890 outbound C-3 employees PTE, 2,400 outbound non-work PTE and 2,400 inbound non-work PTE.

"Thus, there will be: "47,240 outbound PTE and 2,400 inbound PTE. Therefore 95% of the PTE will be outbound.

"C. THE SECOND EXAMPLE REGARDS THE DEPARTMENT DISCUSSION OF THE SFRG'S ERROR IN SUBTRACTING TRANSIT PTE DATA MEASURED AT THE C-3 BOUNDARY FROM TRANSIT RIDERSHIP DATA MEASURED AT THE SCREENLINES.

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"The Department has stated that DTP EIR Tables J.3, J.4, IV.E.1 and 201 Spear Street SEIR Table 2 measure C-3 district transit demand at the C-3 boundary; while DTP EIR Table IV.E.2 and 201 Spear Street SEIR Table 3 measure C-3 and non-C-3 district transit demand at the transit screenlines. DTP EIR Figure IV.E.1 (page IV.E.6) shows these boundaries.

"There is a gap between the C-3 boundary and the transit screenlines for transit systems. The Department states that some C-3 workers may leave the transit system in this gap, and therefore be 'counted' as a C-3 worker in DTP EIR Table IV.E.2 as crossing the C-3 boundary but not be 'counted' as a C-3 worker in DTP EIR Table IV.E.2 at the regional screenline because they left the system. Given this rationale, the Department states that one cannot subtract the information in Table IV.E.1 from Table IV.E.2, since they do not have the same base.

"Table SP-13 [Attachment I of this document] summarizes the relationship between the C-3 boundary and the transit screenlines for transit systems serving San Francisco. This table shows that, for many transit systems, the difference between measuring transit loadings at the C-3 boundary or the transit screenline is zero or negligible. For BART East Bay and Westbay, the Golden Gate Ferry, AC Transit, and the Tiburon Ferry, the C-3 boundary is substantially identical to the screenline. There is no ability for a C-3 workers to get on one of these systems and then get off between the transit demand felt at the regional screenline versus the C-3 boundary. Thus 65% of the transit riders are on systems where there is basically no difference between the C-3 boundary and the regional screenline." (Georgia Brittan, SFRG)

Response

The Commenter has taken Table IV.E.1 from the DTPEIR, a table showing all C-3 travel, both inbound and outbound, and has extracted an outbound C-3 figure for transit travel. It determines that outbound travel is 95% of the total travel (47,370 additional PTE). It then compares this figure with Table IV.E.2 from the DTPEIR, which is a table showing outbound C-3/non-C-3 transit travel measured at the regional screenlines (46,900 additional PTE) to conclude that the total transit demand from both C-3 and non-C-3 is approximately equal to the number calculated by SFRG to be expected from the C-3 District.

Therefore, it concludes that since their calculated total number of outbound C-3 travel is approximately equal to the total number of total outbound travel (C-3 and non-C-3), the DTPEIR cumulative transportation analysis must not have analyzed non-C-3 travel.

There are differences in these tables which make such a comparison invalid.

Table IV.E.1 analyzes both inbound and outbound total travel while Table IV.E.2 analyzes only outbound transit travel. The commenter believes that since its calculations indicate that all but 5% of the travel in Table IV.E.1 is outbound, the tables are comparable. However, the overall transportation model in the DTPEIR measured travel of many hundreds of thousands of people from throughout the City and the region. Five percent of a number of that magnitude is not insubstantial (5% of 256,000 trips is 12,800 trips) and reflects about 30 percent of the 46,000 downtown trips that the commenter has claimed has been omitted from the non-C-3 analysis.

There are other implications behind the percentages. The reason C-3 peak period transit numbers are 95 percent outbound is because of the individual characteristics of the C-3, including land-use mix, employee residence, absenteeism patterns, and transit availability. These are unique C-3 District factors which cannot be applied universally throughout San Francisco.

In its presentation to the Planning, Housing, and Development Committee of the Board of Supervisors on May 7, 1984, the Department of City Planning explained why increases in non-C-3 travel are not readily apparent in the total travel projections contained in the DTPEIR.

1. The screenlines are located beyond the C-3 District boundary. (DTPEIR, p. I.V.E.6) Between the C-3 District and the screenlines are residences and other stopping points where travellers can get off. Therefore, not all persons leaving the C-3 District actually reach the screenlines to be counted in the transportation analysis. The inability to account for all travellers traveling throughout the downtown and the City precludes backward use of the transportation analysis to account for non-C-3 employment.

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2. The transportation analysis was conducted with a computerized mathematical model which used actual measured travel. Data compiled from a 1981-82 survey of C-3 District employees was loaded into the model and the travel information results were approximately identical to the actual total travel at the screenline (measuring points). The modeling process for the DTPEIR transportation analysis used total existing and future employment in the C-3 District as a predictor of existing and future travel. The validation and calibration process for the transportation model is described in the May 7 letter to the Planning, Housing & Development Committee of the Board of Supervisors (see p. 9). Therefore, the transportation model gave accurate results for the total travel at the screenlines. The model did not and could not always provide the individual C-3 and non-C-3 components, nor did it merely add on the 92,000 new C-3 district workers.

3. The growth rate assigned to the identified non-C-3 travel components was based on historic C-3 and non-C-3 travel growth over a five year period from 1977 and 1982 at the particular screenlines. This overall growth rate reflecting both C-3 and non-C-3 historic growth was then used only in measured non-C-3 growth to arrive at future non-C-3 travel volumes. Because the non-C-3 growth rate was based on total travel (C-3 and non-C-3) at screenlines, the DTPEIR assumed that future non-C-3 grew at the same rate as in the past. By assuming historic trends for future non-C-3 travel growth, the DTPEIR overestimates rather than underestimates the effects of non-C-3 growth.

4. The portion of travel which has been identified as "C-3 travel" includes some non-C-3 travellers. At many screenlines it was not possible to differentiate C-3 travel from non-C-3 travel. In those cases, the travel was assigned to the C-3 travel, making it a larger C-3 component. This was done to show C-3 District impacts in the most conservative light. Therefore any value labeled C-3 travel contains a portion of non-C-3 travel.

BART is an example of how non-C-3 travel cannot always be distinguished from C-3 travel in the transit analysis. Not all travellers entering BART from the BART screenlines at the four Market Street stations (from Civic Center to the Embarcadero Station) are from the C-3 District. Travellers entering these stations may actually

work south of Folsom or in Chinatown near the project site or on Van Ness Avenue, but because of the location of the BART stations, would enter the system at one of the four stations corresponding with the edge of the C-3 District boundary. Since it is not statistically possible to separate these non-C-3 travellers from C-3 District workers, the DTPEIR conservatively assigned the total travel to C-3 travel. Therefore, although travel at the BART screenlines has been labeled C-3 travel, the fact remains that C-3 travel includes non-C-3 travel. Even Table IV.E.1 in the DTPEIR which shows C-3 travellers include some inseparable non-C-3 District travellers.

Comments

"III. THE DOWNTOWN PLAN EIR AND THIS DEIR FAIL TO ADEQUATELY REVEAL THE IMPACTS OF ADDITIONAL WORKERS ASSOCIATED WITH CUMULATIVE OFFICE DEVELOPMENT OR OF INCREASE EMPLOYMENT IN DOWNTOWN SAN FRANCISCO.

"In the following discussion, SFRG will demonstrate that:

"Additional employment in the non-C-3 area of San Francisco will be significant from 1984 to 2000.

"The Downtown Plan EIR environmental impact analyses for transit cannot differentiate between the C-3 and non-C-3 area. These analyses show total transit ridership demand from the C-3 area and non-C-3 area, work and non-work trips.

"The total increase in transit ridership forecast by the DTP EIR is unreasonably small given the number of additional San Francisco workers from 1984 to 2000.

"The EIR transit analyses are therefore inadequate.

"A. FUTURE EMPLOYMENT IN THE NON-C-3 AREA OF DOWNTOWN WILL BE SIGNIFICANT AND HAS IMPACTS SIMILAR TO C-3 DEVELOPMENT. THUS THE CUMULATIVE IMPACTS ANALYSIS OF THIS DEVELOPMENT MUST CLEARLY BE EVIDENT IN THE EIR ANALYSIS.

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"Downtown San Francisco non-C-3 office development project adjacent to the C-3 area have project impacts similar to C-3 projects in terms of employment, transit, traffic, transportation and housing. (The I-Hotel project is a non-C-3 office development). According to the Downtown Plan EIR only 12% of the 36 million square feet of office development in San Francisco between 1965 and 1984 occurred in the non-C-3 area. (DTP EIR p. IV.B.3) That document also states that: 'Citywide employment is forecast to increase between 1981 and 2000 under the policies of the DTP. Just over half of this growth would occur in the C-3 district. The balance is likely to be divided about equally between the areas surrounding the C-3 (south to China Basin including Mission Bay, Civic Center, Northern Waterfront and the Washington/Broadway Special Use District) and the rest of the City.' (DTP EIR IV.C.47)

"This means there will be approximately 92,000 additional C-3 employees from 1984 through 2000 and 92,000 additional non-C-3 area employees in San Francisco. (DTP EIR Table IV.C.15 p. IV.C.41) 46,000 of the non-C-3 area employees will be in the Downtown San Francisco non-C-3 area employees which the Court determined is part of the Downtown area.

"The importance of the non-C-3 area is illustrated by the following statement from another, nearly identical SEIR: 'As explained in the DTP EIR and above, with lower C-3 district growth under the DTP, there could be more development in other City areas outside the C-3 district. (Montgomery/Washington SEIR EE#81.104 p. 128)

"The Downtown Plan EIR expects that the areas of San Francisco adjacent to the C-3 particularly to the south of the C-3 district, will experience substantially more growth in employment than in the past.

"The Comments and Responses for the Washington/Montgomery SEIR stressed the significance of non-C-3 development in the statement that: 'As a result of this pattern (of development shifting to the non-C-3 area), comparisons which show lower C-3 district development in the future as compared to total Citywide development in the past do not necessarily indicate that future, Citywide development would be lower than in the past. As explained in the Downtown Plan EIR, it is expected that there would be proportionately more development in city areas outside the C-3 district in the future. The extent of this shift also depends on the zoning policies currently under review for the areas to the south of the C-3 district.' (Washington/Montgomery SEIR EE#81.104 p. 126)

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"This is a revealing statement. It says that overall Citywide development (which has been over 3 million square feet per year over the past seven years) may not be lower than in the past, but that development in the non-C-3 area will increase above historical levels.

"It is therefore clear that the SEIR [sic] must analyze the impacts of both C-3 and non-C-3 employment. SP-16 shows the March 22, 1985 List. The starred buildings are the non-C-3 projects. The List shows that 33% of the projects are in the non-C-3 area immediately adjacent to the C-3 district and 67% of the development on the March 22, 1985 List is in the C-3 area. This is a 2 to 1 C-3 to non-C-3 ratio of buildings, approximately the same as the 2 to 1 C-3 to non-C-3 ratio predicted for employment from 1984 to 2000.

"It is clear that the SEIR [sic] must analyze the cumulative impacts of all probable future development. To the extent that the Downtown Plan EIR tables and conclusions are used in the SEIR to guide decision-making, the SEIR should ensure that the tables adequately include non-C-3 area impacts.

"B. THE DOWNTOWN PLAN EIR ENVIRONMENTAL ANALYSES FOR TRANSIT RIDERSHIP DEMAND DO NOT DIFFERENTIATE BETWEEN THE C-3 AND NON-C-3 DISTRICT, OR WORK AND NON-WORK TRIPS. THESE ANALYSES ONLY SHOW TOTAL TRAVEL FROM ALL AREAS AND SOURCES AT TRANSIT SCREENLINES.

"SP-10 indicates DCP statements that the outbound P.M. Peak-Hour and Peak-Period transit ridership demand shown in the DTP EIR Table IV.E.2 and 201 Spear Street SEIR Table 3 are for total demand from all areas and sources and cannot be easily broken down into components because of the computer model used in the DTP EIR.

"The outbound P.M. Peak-Hour and P.M. Peak-Period transit ridership contains riders from six sources. The Department cannot identify which components of the total travel is due to the C-3 district, but the Department asserts that the total travel estimate is reasonable. The six travel components which show the 1984 to 2000 increase in travel demand are as follows:

"C-3 District Employee Travel from 92,000 additional C-3 workers

"C-3 District non-worker Travel

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"Downtown non-C-3 District Employee Travel for 46,000 Additional non-C-3 workers

"Downtown non-C-3 District non-worker travel

"Rest of City non-C-3 District Employee travel for 46,000 Additional non-C-3 workers

"Rest of City non-C-3 District non-worker travel

"The test of the DTP EIR's environmental analysis is whether it is reasonable that there will be approximately 45,000 additional outbound P.M. Peak Period riders on transit due to the 92,000 additional C-3 workers and 92,000 additional non-C-3 workers (a total of 184,000 additional San Francisco workers.)

"C. THE TOTAL INCREASE IN PEAK HOUR AND PEAK PERIOD TRANSIT RIDERSHIP FORECAST BY THE DOWNTOWN PLAN EIR IS UNREASONABLY SMALL GIVEN THE NUMBER OF ADDITIONAL SAN FRANCISCO WORKERS FROM 1984 to 2000.

"SFRG will demonstrate this fact using two entirely different perspectives.

"The first perspective compares the information in Tables IV.E.1 and IV.E.2 after assuming that the data bases are adjusted to be identical (i.e. there is no 'subtracting two oranges from one apple').

"The second perspective does not use Table IV.E.1 or PTE numbers at all, but looks only at the number of C-3 workers and the percentage that commute on transit during the P.M. Peak Period.

"FIRST PERSPECTIVE

"(1) DTP EIR Table IV.E.1 and 201 Spear Street SEIR Table 2 contain identical information and show P.M. Peak Hour and Peak Period C-3 transit demand in terms of Person-Trips-Ends (PTE), for C-3 District workers and C-3 District non-workers. These tables show PTE both to and from the C-3 District. However, the tables can be adjusted to show the number of outbound PTE as indicated in SP-12 [see Attachment I of this document]. As has been demonstrated, 100% of the worker PTE and 95% of the overall

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(worker and non-worker) PTE demand during the P.M. Peak Periods is outbound. SP-12 shows there are 28,890 additional outbound PTE on transit from the C-3 district alone during the P.M. Peak Hour and 47,370 additional outbound PTE during the P.M. Peak Period due to increase employment in the C-3 District from 1984 to 2000.

"DTP EIR Table IV.E.2 and 201 Spear Street SEIR Table 3 contain identical information and show P.M. Peak Hour and Peak Period outbound transit demand for both the C-3 District and non-C-3 District, workers and non-workers. SP-15 shows that there are approximately 31,400 additional P.M. Peak Hour outbound riders and 46,900 additional P.M. Peak Period outbound riders due to increased employment between 1984 and 2000. For the P.M. Peak Period, a companion of these tables would show the following:

"Outbound Transit Demand from 92,000 C-3 District workers (from SP-12 [Attachment I of this document] and DTP EIR Table IV.E.1) 47,370

"Outbound Transit Demand from C-3 District non-workers

"Outbound Transit demand from 46,000 Downtown non-C-3 workers

"Outbound Transit demand from Downtown S.F. non-C-3 non-workers

"Outbound Transit demand from remaining S.F. non-C-3 non-workers

"Total Transit Demand (From SP-15 and DTP EIR Table IV.E.2) 46,900

"It is this calculation which makes SFRG suspicious of the DTP EIR conclusion. While the Department assures SFRG transit demand from all areas and sources is revealed in the impact analyses tabulated in Table IV.E.2, the total number of outbound riders -- 46,900 -- is approximately equal to what should be expected from the C-3 District alone: 47,370.

"The Department is quick to point out an error in the above comparison, because C-3 transit demand is determined at the C-3 boundary and the total transit demand is determined at the regional screenlines. SFRG does not believe this makes a significant difference. But to be beyond reproach, SP-14 [Attachment I of this document] tabulates these same figures from Table IV.E.1 and IV.E.2 using only outbound riders from each

table, but includes only those transit systems where the C-3 boundary and the transit screenline are identical for all practical purposes. These transit systems are BART, AC Transit, Golden Gate and Tiburon Ferries, and CalTrain. This table shows that there are 27,260 additional 1984 to 2000 total C-3 and non-C-3 Outbound P.M. Peak Period transit riders. Again, this table demonstrates that the C-3 district transit demand from the entire City.

"The same type of analysis can be performed transit system by transit system. For example, take BART.

"a. The Regional screenline for BART is the same as the C-3 boundary.

"b. Outbound P.M. Peak Period PTE from the C-3 District alone is 21,755 additional riders from 1984 to 2000.

"c. The DTP EIR states that total BART ridership from all areas and sources will increase by 21,600 riders from 1984 to 2000.

"This does not make any sense. These tables indicate there is no difference between total increased transit demand from the 92,000 additional C-3 employees and the increase transit demand from the 184,000 additional Citywide employees. No non-C-3 area riders show up on BART, contrary to the statements by the DCP.

"SECOND PERSPECTIVE

"(2) SFRG will use a totally different approach to demonstrate the fact that despite Department assertions to the contrary, the transit demand from the C-3 area alone equals what the Department contends is the Citywide total transit demand. This approach uses information on work-related trips only. As noted previously, all C-3 workers who are at work in the C-3 District in the evening exert the outbound PTE on their way home.

"Table IV.C.16 of the Downtown Plan EIR shows there will be 91,260 additional C-3 District workers between 1984 and 2000. There will also be approximately 91,260 additional non-C-3 workers, 45,630 of which will be in the downtown San Francisco non-C-3 area.

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"The following discussion will demonstrate that the number of additional transit riders which the DTP EIR states will occur from increased Citywide employment is too small, and only reflects the transit trips which could be expected from increase employment in the C-3 area of Downtown San Francisco.

"The DTP EIR (and the Downtown Plan itself on p. 117) states its transit projections are based on achieving its goal of 62% transit ridership. This is confirmed by Table IV.E.1 which shows that in 1984 transit ridership was 59.6% of P.M. Peak Period commuters and in 2000 will be 62.4% of P.M. Peak Period commuters. (See SP-4.)

"The DTP EIR also states that 70% of C-3 employees travel from work during the P.M. Peak Period. This is also confirmed by SP-3 which shows 68.4% travel in the P.M. Peak Period in 1984 and 68.9% of commuters will travel in the P.M. Peak Period in 2000.

"There will be 91,260 additional C-3 workers from 1984 to 2000. (See SP-2.)

"Using the above information, it can be calculated that 44,654 additional C-3 workers will use outbound public transit during the P.M. Peak Period due to C-3 employment increases from 1984 to 2000. This calculation is based entirely on employment based estimates in the Downtown Plan EIR. The calculation is:

"Transit Trips By Additional C-3 Workers $(91,260)(68.9\% \text{ of workers})(62.4\% \text{ on Transit}) = 39,326$ commuting in peak period

"Increased Trips By 280,000 Existing C-3 Workers $(280,860)(68.9\% \text{ of workers})(62.4\% - 59.6\% \text{ on}) = 5,418$ commuting in Transit peak period

"Additional C-3 workers on Transportation 1984 to 2000 = 44,454

"The Downtown Plan EIR shows that there will be 46,900 additional outbound P.M. peak period transit riders (work-related) for all of the City (C-3 and non-C-3) during the P.M. Peak Hour.

"If the 91,260 additional C-3 workers from 1984 to 2000 will take approximately 44,600 trips on transit during the P.M. Peak Period, and there are only 46,900 additional

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transit trips projected from all areas and sources, there are virtually no additional trips associate[d] with the 91,260 non-C-3 workers.

"Based on the DTP EIR employment estimates: 68.9% of workers commute during the P.M. peak period; 62% of the workers take transit; there is 0.14 non-work transit rider for each worker. Based on these estimates there should be 87,522 additional Outbound P.M. Peak Period transit riders.

"The Downtown Plan EIR is inadequate because it assesses the impacts of only 46,900 total additional transit riders from over 182,520 additional San Francisco workers and non-workers, while the transit ridership characteristics described in the Downtown Plan EIR indicate there will be 87,522 additional riders. Thus the Downtown Plan EIR analyzed only half of the probable numbers of additional transit riders.

Areas	Number of Additional Workers	Number of Additional Workers on Downtown Transit During the P.M. Period	Number of Additional Outbound non-workers on Downtown Transit during the P.M. Peak Period	Total Additional Outbound Riders on Transit
Downtown Non-C-3 District	91,260	44,654	6,251	50,905
Downtown Non-C-3 District Surrounding the C-3 Area	45,630	22,327	3,125	25,452
Remaining Non-C-3 Area of S.F.*	45,630	11,165	N.A.	11,165
Entire City				87,522

* Assumes approximately one-half of additional transit riders will travel to the Downtown C-3 area and then transfer to outbound transit. This is based on patterns of residence predicted by the Downtown Plan EIR.

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"The Department will be quick to criticize this analysis by saying the additional 44,454 C-3 numbers may not get to the regional screenline in the peak period, but may be somewhere between the C-3 boundary and the transit screenline. Again, SFRG believes this makes little difference. But to be totally above reproach, this exact calculation can be used for those transit systems which have identical C-3 boundaries and transit screenlines.

"Take BART, for instance. Table J.5 in the DTP EIR shows that 16.7% of the P.M. Peak Period commuters used BART in 1984 and 20.% of the P.M. Peak Period commuters will use BART in 2000.

"Additional C-3 District Work Transit Trips on BART 1984-2000

$(91,260)(20.6\% (68.9\%) + (280,860)(20.6\% - 16.4\%) (68.9\%) = 12,956 + 8,127 = 21,083$

"Therefore, there should be 21,083 Outbound C-3 workers on BART due to C-3 District employment growth from 1984 to 2000. However, Table IV.E.2 of the DTP EIR shows that there will be an increased transit demand of 21,600 riders on BART during the P.M. Peak Period from all sources -- C-3 District workers and non-workers.

"Since the transit screenlines for BART are identical to the C-3 boundaries, the transit analysis in the Downtown Plan EIR fails to include the transit demand for the non-C-3 area.

"Please respond to the above comments. The cumulative impact of transit in San Francisco is too important to be ignored." (Georgia Brittan, SFRG)

Response

The commenter believes that the Downtown Plan EIR failed to analyze the transportation impacts of growth for the portions of San Francisco lying outside of the C-3 district, and for the region. This assertion is incorrect. The Downtown Plan projected total travel on all relevant transportation systems including travel generated by the C-3 district, the rest of San Francisco, and the region. The forecast methodologies were different, and for excellent reasons. The C-3 methodology in many instances enabled the EIR to break out the portion of total

travel created by the C-3 growth, in turn facilitating a comparison among the alternatives analyzed in the Downtown Plan EIR. In certain cases, as discussed below, it was impossible to accurately segregate the C-3 portion of the total travel, but in all cases the total travel is predicted in an accurate and perfectly legal method. The following explanation has been made available at more length to the decision-makers and the public in the course of the public debate over the Downtown Plan, especially in the documents listed in an earlier response.

Many jurisdictions analyze transportation impacts by obtaining from each transportation agency its regional projections for ridership or auto trips and simply including that information in the EIR. This approach would not, however, have provided the detailed information that was necessary for the City's purposes. It would have been impossible to derive a C-3 portion of travel from the regional projections, so that the DTPEIR would have been unable to compare the differences in impacts among the various alternatives. All the alternatives would have shown the same transit impacts in the year 2000. In addition, the transportation agencies projections are based on the ABAG employment discussed infra and would have lead to lesser impacts than those found in the DTPEIR.

Instead of adopting the actual regional transit agency projections, the City used transportation agency data in its own transportation model. Transportation agencies measure travel at various locations in the City and region. For purposes of the DTPEIR, the Department chose those measuring points available from the public transportation agencies which closely approximated the boundaries of the C-3 District in order to account for the greatest number of C-3 District workers. For example, for BART, the Department used the counts obtained by BART made at the four Market Street entrances at Embarcadero Station to Civic Center Station, since these measuring points are situated within the C-3 District. For auto travel, the Department obtained counts made at the City's edges from agencies maintaining the roadways, such as Cal Trans for U.S. 101 and I-280, Golden Gate Bridge Transit District for the Golden Gate Bridge, and Metropolitan Transportation Commission for the Bay Bridge. The C-3 portion of the auto travel was in addition taken from measurements of vehicles at city street intersections and freeway on-ramps from the C-3 District, and information from employee surveys. For the Muni transit lines,

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counts were taken where the buses were at maximum capacity and where the most C-3 District travellers could be found; these counts were aggregated into major travel corridors (e.g. northwest, southwest) for analysis purpose. (DTPEIR, Vol. II, pp. J.20-22; Vol. II, p. C&R-E.27; p. C&R-E.16; Transportation Analysis for the Downtown Plan EIR Supplemental Material, October 17, 1984, pp. 4-5.

Data from the C-3 District employer/employee survey on travel times, travel directions and travel modes were used to develop a computer model of regional travel. The model results were compared with the actual ridership or vehicle counts from the transportation agencies. Adjustments were made so that the model reflected actual total travel from both C-3 and non-C-3 areas at all relevant points. To the extent that it was possible to identify C-3 travel, a portion of the total was allocated as travel coming from the downtown C-3 District. Those remaining after this allocation were designated as travellers coming from outside the C-3 District who pass through the C-3 District during the two hour 4 p.m. - 6 p.m. peak period (study period). Because these non-C-3 District travellers use the same mode of transportation and travel at the same time as the C-3 District traveller, they necessarily comprise part of the total cumulative travel. (DTPEIR, Vol. III, p. C&R-E.15-17, p. C&R-E.25-26).

As discussed above the growth of non-C-3 travel was not based on employment projections; the non-C-3 growth was nevertheless accounted for and included in the total travel analysis through the use of historic growth trends./1/ Growth of non-C-3 travel was based on the assumption that ridership on each type of transit, bridge, freeway, or major intersection would grow at the same rate as the rate of total travel in the past five years from 1977-1982, a period of high growth./2/

The proper inquiry is whether the DTPEIR accurately projects total travel on the various transportation systems. The issue is not whether the City accurately allocated the total travel between the C-3 District users and the non-C-3 District users. This allocation of non-C-3 District travellers is not legally required and was attempted merely for informational purposes. For the purpose of cumulative transportation impact analysis, the critical information, however, is the total amount of impacts which will stem from the proposed growth controls.

That the DTPEIR transportation analysis model accurately projects total travel is supported by overwhelming substantial evidence. (DTPEIR Vol. I, p. IV.E.1-IV.E.7, Vol. II, Appendix J). The fact that it was not possible in all instances to make an allocation between C-3 and non-C-3 travel does not mean that non-C-3 travel was not analyzed, nor does it make the DTPEIR inadequate. Travel from outside the C-3 District was included in the estimates of travel and is therefore accounted for in the impact analysis. The transportation analysis for the DTPEIR was never intended to be a one-for-one accounting system for employees in the City and region. (DTPEIR, Vol. III, pp. C&R-E.16 & E.-27, May 7, 1985 letter to PH&D, p. 8). The non-C-3 projection simply was not constructed on forecasts of the number of employees. Therefore, it is inappropriate to attempt, as the Commenter has done in Section 111.C(2), to equate the number of non-C-3 employees estimated elsewhere in the DTPEIR with the allocation of non-C-3 ridership.

The Commenter attempts to demonstrate that non-C-3 transit travel was omitted from the analysis when in fact all that is occurring is the partial inability to segregate impacts of the non-C-3 growth from the C-3 growth. Increases in non-C-3 travel are not readily apparent in the total travel projections contained in the DTPEIR (DTPEIR, Vol. II, pp. J.20-25; Transportation Analysis for the DTPEIR, esp. p. 6; There are four major reasons why this is so:

1. For many transit systems, it was impossible to separate C-3 travellers from non-C-3 travellers. In those cases, the travel was allocated as C-3 travel, thereby overestimating the C-3 component of the travel model. This was done to show C-3 District impacts in the most conservative light. Therefore, any value labeled C-3 travel contains a portion of unidentified non-C-3 travel. This is particularly true for BART, Golden Gate Transit, Sam Trans, and SPRR because almost all of the riders on these systems must either board in the C-3 District or at a single terminal and there is no effective way to identify those travellers coming from the C-3 District and those coming from other areas of the City. However, despite the inability to make an allocation, the total number of travellers was accounted for.

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For example, the measuring points for BART were the four Market Street stations (from Civic Center to the Embarcadero Stations). Not all travellers entering these stations are from the C-3 District. Travellers entering these stations may actually work south of Folsom or in Chinatown near the project site or on Van Ness Avenue, but because of the location of the BART stations, would enter the systems at one of the four downtown stations in the C-3 District. Since it is not statistically possible to separate these non-C-3 travellers from C-3 District workers, the DTPEIR conservatively assigned the total travel to C-3 travel. Although travel at the BART measuring points has been labeled C-3 travel in the DTPEIR, the fact remains that C-3 travel includes non-C-3 travel. C-3 travellers include some inseparable non-C-3 District travellers.

2. Another reason the non-C-3 travel is not readily apparent is because the estimation of 92,000 additional non-C-3 employees is not an employment forecast, but only an estimation which is in fact an overestimation used for the housing impact analysis. (DTPEIR, Vol. I, pp. IV. C.47-49; Vol. III, pp. C&R-B.42-43). The estimation is based on the assumption that policies and regulations for areas outside the C-3 District will continue to allow growth. This, however, is clearly a conservative approach, since the Board of Supervisors has down-zoned the Tenderloin, and plans have been proposed by the Planning Commission to reduce density and thus growth potential in the areas adjacent to the C-3 District, including South of Market, Chinatown and Van Ness Avenue (March 5, 1985 letter to PH&D, p. 7). This is yet another reason why one cannot compare the non-C-3 employee estimation with the portion of identifiable non-C-3 travel and conclude that no non-C-3 travel was included.
3. As previously stated, it is appropriate to include in the total cumulative analysis only those non-C-3 travellers travelling through the C-3 District using the same modes as the C-3 District travellers and travelling during the peak period. However, not all non-C-3 District workers travel during the peak period. It cannot be assumed, as Petitioner has improperly done, that all non-C-3 District travellers from throughout the entire City, possess the same travel characteristics of the C-3 District travellers or that the non-C-3

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District travellers would travel by transit in the same proportion as do C-3 District travellers. Such an assumption is disputed by fact. Census statistics and work place surveys show low transit use in non-Downtown non-C-3 areas. Non-C-3 District employees do not have the same high transit usage as the downtown workers.

Non-C-3 businesses include industrial, wholesaling business and other. Workers in these businesses will have different work hours and commute patterns from downtown office workers. Important considerations include the availability of public transportation in the particular non-C-3 areas, the distance it would take for the non-C-3 worker to get to a central transit line, and the greater availability of cheaper parking in non-C-3 areas. Thus, it is less likely that a non-C-3 District worker will use transit to the degree of C-3 District workers. Even assuming that some non-C-3 workers will ride transit into the C-3 District only to transfer to another route to ride transit out of downtown, by the time the non-C-3 worker reaches the C-3 District to get on transit, it would often be after the 6:00 p.m. peak period. Therefore, there is no basis to insist that all non-C-3 District travel must be accounted for on the same transportation modes during the peak period with the C-3 District travellers.

For example, the transportation analysis was able to include a non-C-3 component for BART based on riders who get on BART before the Civic Center station and ride through downtown to the East Bay during the two-hour p.m. peak study period (4 p.m.-6 p.m.) (Transportation Analysis for the Downtown Plan EIR Supplemental Material). Insofar as the DTPEIR is only concerned with riders who contribute to the total ridership of BART at the same time the system is used by the C-3 District travellers, only those non-C-3 BART riders who stay on BART through the Embarcadero Station were counted (estimated ridership of 2300). This ridership figure was not increased for the future because there was no statistical or other basis for increasing the number of riders using employment estimates, as there are no estimates of likely growth in these areas. These BART stations are located at 16th & Mission, 24th & Mission, Glen Park, Balboa Park and Daly City. Small commercial areas around these stations are of the neighborhood-serving type and few workers are

likely to commute across the Bay to work. It is logical to assume that given cheaper parking, relative ease of freeway access and relatively longer transit commute, any additional commuters will be in automobiles. Moreover, as one moves further away from the greater downtown area, workers will have different commute patterns and times so that travel by these workers will not contribute to the transportation impacts caused by the C-3 District travellers. Finally, insofar as the BART non-C-3 ridership was already over-estimated by 1,000 riders, the excess will take care of any increases in non-C-3 BART ridership because any increase will simply be negligible. (DTPEIR, Vol. II, Appendix J, p. J.23).

4. In the greater downtown area and other areas outside the C-3 District, a majority of the people drive to work rather than take public transportation because of different work hours, less transit availability, and cheaper parking rates. Petitioner, therefore, cannot look at the transit analysis and conclude that all non-C-3 travel was omitted from the cumulative analysis. In doing so, Petitioner drops an entire group of non-C-3 travellers using automobiles.

The commenter's extrapolation of numbers to reach its figure of 44,654 additional C-3 workers using outbound transit during the P.M. peak period was specifically disavowed by the DTPEIR (DTPEIR, p. C&R-E.19-E.20):

In order to crudely estimate the new transit demands (trips created by Downtown employment growth of individual land uses (e.g. hotels, retail establishments, office building), the commenter can, by extrapolation, multiply the estimated change in employment of individual business activities (see p. IV.C.33), by the daily trip rate per employee (Table J.1, p. J.7), by the peak-period trip percentage (Table J.2, p. J.8), by the transit share percentages found in the 1983 Transportation Guidelines. However, this estimate would not correspond to the transit ridership increases projected in the EIR because the crude estimate does not include effects from:

- o changes in residence patterns of employees;

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- o out-migration of employment and subsequent loss of existing transit riders;
- o shift of auto users to transit;
- o changes (increases and decreases) in transit service availability; and
- o changes in patterns of transit use by existing employees.

The EIR analysis has incorporated the effects of the above points through its use of the entire existing and future C-3 District employment population, not just the change in employment. Use of the incremental change (as suggested in the comment) does not allow for analysis of the effects of changes in the existing employee population's travel patterns (this latter item is especially important as the existing employees outnumber the new employees by 2:1).

These estimates of non-C-3 growth cannot be used as if they were real employment forecasts to mathematically arrive at a figure of 87,522 additional outbound P.M. peak period C-3 and non-C-3 transit riders, or a conclusion that since the DTPEIR only assess impacts of 46,900 additional transit riders rather than this figure of 87,522, the DTPEIR cumulative transportation analysis is inadequate.

For the reasons previously discussed above, this manipulation of the numbers is improper. Moreover, as discussed above, one cannot assume the characteristics of the C-3 District traveller apply equally to all non-C-3 District travellers.

The transit share percentage and the percentage of employees travelling during the peak period were developed not out of air, but are based on unique C-3 District factors. Characteristics unique to C-3 District workers include land use mix, employee absenteeism patterns, employee residence and income characteristics, transit service availability, mix of employment categories, etc. While these factors may apply to downtown projects similar in use and transit availability to C-3 projects, such as the proposed Pan Magna Plaza, they will not reflect overall transit patterns in non-downtown projects or overall patterns in downtown development that is not similar to C-3 development (e.g., warehouse uses or wholesale showroom uses). The commenter has assumed all of the C-3 District characteristics for all other sectors of the City and region.

Equally without basis is the assumption that the majority of future non-C-3 travel will be absorbed by transit. In fact such an assumption is disputed by fact. Census statistics and work place surveys show low transit use in non-C-3 areas. It simply cannot be assumed that all non-C-3 District employees will have the same high transit share modal split as downtown workers. Non-C-3 businesses include industrial, manufacturing, wholesaling businesses and others. Workers in these businesses will have different work hours and commute patterns from the C-3 District office worker. Important considerations include the availability of public transportation in the particular non-C-3 areas, the distance it would take for the non-C-3 worker to get to a central transit line, and the greater availability of cheaper parking in non-C-3 areas. Thus, it is less likely that a non-C-3 worker will use transit to the degree of C-3 workers. The assumption that half of all non-downtown workers will ride transit into the C-3 District only to transfer to another route to ride transit out of downtown is not supported by fact. Even assuming that some non-C-3 workers have this commute pattern, by the time the non-C-3 worker from either Geary or Ocean Avenue reaches the C-3 District to get on transit, it would probably be after the 6:00 p.m. peak period.

Finally, one cannot just look at the transit analysis and conclude that all non-C-3 travel was omitted. In doing so, SFRG drops an entire group of non-C-3 travellers using automobiles. Travel for non-C-3 non-workers is mostly by auto rather than by transit. Table IV.E.3 of the DTPEIR shows 66,000 vehicles crossing the regional screenlines during the peak period, DTPEIR p. IV.E.35). Appendix J of the DTPEIR states that one-half of these vehicles are non-C-3 trips. If average occupancy of these 30,000 non-C-3 vehicles increase from approximately 1.1 persons per auto to 2.0 persons per automobile, an increase of 27,000 persons travelling in the peak period would occur. The DTPEIR measured travel by automobile by the number of vehicles rather than passengers, since vehicles rather than passengers cause the traffic impacts on streets and freeways. It was not then possible to identify the number of non-C-3 travellers travelling by car. This is again another reason why one cannot equate the employment numbers with non-C-3 travel, some of which is measured in vehicle trips, and conclude that the transit analysis has lost all the non-C-3 traveller (see May 7, 1985 letter to PH&D, p. 4).

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The use of BART as an example of how cumulative transportation analysis has been underanalyzed by half is discussed above. We would reiterate the critical point that since both C-3 and non-C-3 riders must board at the four downtown stations and it is not possible to separate C-3 riders from non-C-3 riders, all BART riders entering at these stations have been treated as C-3 riders, which overestimates the C-3 component. Any value assigned as C-3 travel must also contain a portion of non-C-3 travel. It was simply not possible to separately identify C-3 and non-C-3 in all cases, especially at the transit screenlines.

NOTES - Downtown Plan EIR Transportation Analysis

/1/ Downtown Plan EIR Forecasts and Non-C-3 Analyses, presented to PH&D, March 19, 1985; May 7, 1985 letter to PH&D, pp. 3-13.

/2/ It should be noted that the use of these historic rates overestimates impacts. The historic data, and thus the rates derived from that data include traffic from both the C-3 and non-C-3. (DTPEIR, Vol. p. J.20-25; and Vol. III, pp. C&R-E.16-17). The C-3 area grew much faster than the non-C-3 and C&R-E.16-17). The C-3 area grew much faster than the non-C-3 and thus pushed up that rates. Actual non-C-3 travel is unlikely to grow at the same rate as the C-3 travel demand of the past. The DTPEIR has thus deliberately overestimated the effect of non-C-3 travel growth in light of the growth forecasts made for the DTPEIR and by the Association of Bay Area Government (ABAG). (DTPEIR Vol. III, p. C&R-E.16). Thus, contrary to Petitioner's assertion that no non-C-3 travel was included, the fact is that it was included and was probably overestimated.

Comment

"IV. This EIR relies on the Downtown Plan EIR for the Cumulative Analysis of Travel Demand and Housing Impacts for the years 1984, 1990 and 2000. To what extent does this EIR rely solely on the Downtown Plan EIR? Please make this clear in the summary of the EIR that the reader should have read or should read the Downtown Plan EIR.

"On page 139 [sic, p. 111] of this EIR it says that the Downtown Plan EIR represents a 'refinement' of the existing transportation analysis. Please explain how this is a refinement? Please explain what information this EIR gives to the public and decision makers that an earlier EIR (pre-DTP EIR) for a similar project would not give. Please explain how much more (or less) information the public now has and why the decision makers will have a greater understanding of the cumulative impacts from office development in San Francisco." (Georgia Brittan, SFRG)

Response

On p. 111 of the EIR, the second sentence under "Regional Cumulative Impacts" is revised to read as follows (new language is underlined):

The Downtown Plan EIR method is a transportation analysis process in which a forecast of employment growth, independent of a list of proposed projects, is used to forecast future travel.

The Downtown Plan EIR's cumulative impact analysis methodology differs from the analysis in previous EIRs for downtown office projects using the cumulative list method. Rather than projecting cumulative impacts based on a list of proposed, approved and under construction office and retail projects, the Downtown Plan EIR forecasts total downtown employment through the year 2000. Cumulative impacts were based on the demand by downtown employers and employees for commercial space, transportation, housing and other services.

The Downtown Plan methodology provides the public and decision-makers with the same information that they were provided with using the list method. However, the Downtown Plan method provides a more accurate assessment of cumulative impacts than the old list based method.

The following discussion, which has been reproduced from pp. 173-177 of the Final Supplement EIR (SEIR) for the Montgomery-Washington building (81.104E, Department of City Planning, certified December 6, 1984) presents a more detailed explanation of the technical and data base differences between the two methods of analysis.

[T]he Downtown Plan EIR method and the September 1983 Transportation Guidelines method differ for the three major reasons:

- the total amount of travel projected by the two methods is different (the list-based analysis projects less cumulative travel);
- the two methods use different residential distributions (the Transportation Guidelines assign more people to San Francisco); and
- the two methods use different modal splits.

Regarding the difference in total travel projection, on a single-project basis, the two methods would project the same amount of travel because the trip

generation rates from the 1983 Guidelines were used to project the project travel in the [Draft] SEIR. The difference in travel is present only at the cumulative level and is a result of two factors. The primary factor is that the cumulative list method projects less overall travel than does the Downtown Plan EIR Method for the year 2000. This underestimate arises from the fact that the List can project only known development and thus cannot include development yet to be proposed. Conversely, the Downtown Plan EIR method, through the use of forecasts, has estimated additional growth in the future to the year 2000 (growth that the List does not include). As noted on p. 48 of the [Draft] SEIR, the secondary difference is a function of the fundamental difference between the two methods. The list-based analysis assumes all cumulative travel will come from only two sectors of development (office and retail), whereas the Downtown Plan EIR projects travel from all sectors of future development. An additional factor complicating the comparison of the two methods is that the list-based analysis employs single-use trip generation data to estimate total travel through the process of adding together the trip generation estimates from all the individual buildings on the list. These single-use trip generation rates do not account for trips going from one building to another within the Downtown. Studies for the Downtown Plan EIR have confirmed that there is considerable travel between land uses in the downtown area. The list-based analysis adds each trip as if it were a new trip in or out of the downtown, and thus overestimates the total number of peak-hour and peak-period trips in and out of the downtown area.

Because the Downtown Plan EIR analysis deals with total travel to and from the C-3 District, a refined method of projecting travel that accounted for travel made between land uses inside the C-3 District was used. Because the discounting for trips internal to the C-3 District was applied at the trip generation stage of the travel demand analysis, the amount of discounting is uniform throughout the analysis (i.e., the internal travel was removed from the analysis prior to assigning travel to subregional zones or to travel modes). Analysis (Intra-CBD Secondary Travel Patterns of Downtown Workers, ASCE, 1982) has shown that while internal travel occurs throughout the day, the majority of internal trips take place during the 11:00 a.m. to 1:00 p.m. period. Additionally, the same data show that between 30% and 60% of downtown workers make trips internal to the downtown during the working day (the ASCE data did not count trips made internal to a single building, only trips between buildings). In terms of the office trip generation rate from the 1983 Guidelines (18.1 pte per 1,000 gross sq. ft.), if an average of 45% of downtown office employees make one trip (2 pte -- one going, one returning) internal to the downtown area during the work day, then approximately 20% of the travel to and from a proposed office building in the downtown would be overcounted as new travel in and out of the downtown area by the 1983 Guidelines. When the effects from more than one land use and more than one proposed building are added together (i.e., the double-counting of the two ends of the same internal trip from office to retail is inherent in the 1983 Guidelines trip generation rates), the effect of overcounting of new travel in and out of the downtown becomes extreme.

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The trip generation process used in both methods first calculates travel on a daily basis and then applies peak-hour and peak-period percentages to the daily travel to get peak-hour and peak-period travel. Because the process uses percentages of daily travel to get peak travel, the 1983 Guidelines rates inherently incorporate the same percentage of overcounting in the peak as in the daily travel. For the Downtown Plan EIR, the daily trip generation rates and the peak percentages were selected independently of those in the 1983 Guidelines and validated through comparison with observed travel volumes to and from the C-3 District. Because of the validation process, it is not possible to determine the percentage of internal travel discounted from the peak rates in comparison with the discounting at the daily level. Additionally, because of the two discrete time frames used in the Downtown Plan EIR, the amount of internal travel during the peak hour (4:30 p.m. to 5:30 p.m.) differs from that during the peak period (4:00 p.m. to 6:00 p.m.). A trip that remains internal to the C-3 District during the peak hour but leaves the C-3 during the peak period would be counted under the Downtown Plan EIR only as an outbound peak-period trip (which it is in terms of the screenline analysis) whereas the 1983 Guidelines would count it as two outbound trips, one in the peak hour (from the primary land use) and one in the peak period (from the secondary land use).

Regarding the differences in travel by mode in Table 2 [in the Draft SEIR], the changes in residential distributions and modal splits between the two methods account for most of the differences. ... The following chart illustrates how the changes in modal split and the changes in residential distribution affect the total travel assignment. The data in the chart was developed on the basis of the travel demand from a hypothetical downtown building that has 500,000 gross sq. ft. of office space and 40,000 gross sq. ft. of retail space. Such a building would generate about 860 p.m. peak-hour work-related person trip-ends (pte) under either method of cumulative analysis. The chart shows p.m. peak-hour work travel first assigned on the basis of the 1983 Guidelines residential distribution (Area %) and modal split (Mode %). To show the effect of the change in residence patterns and modal split under the Downtown Plan EIR, two intermediate conditions are shown. One condition shows how changing the residence pattern only (i.e., the modal split is not changed) affects the travel assignment. The other shows the effects of changing only the modal split while holding the residence pattern constant. The fourth condition in the chart is that of the composite effect of changing both the residence pattern and the modal split.

The chart illustrates the fact that it is not possible to apply one conversion factor to get from the list-based results to the Downtown Plan EIR results. The comparison process is further compounded because other (non-work) travel assignment is changed in a similar fashion. The distribution of downtown workers by county of residence throughout the region (the residence patterns for downtown workers) was an input to the transportation analysis using both the list-based approach and the Downtown Plan EIR approach. Under the list-based approach where residence patterns are derived directly from the results of the 1982 C-3 District Employee Survey, the percentage of the downtown workforce residing in San Francisco is assumed to remain constant over time. Implicitly, this assumes that, in the future, employment, housing,

COMPARISON OF P.M. PEAK-HOUR WORK TRAVEL ASSIGNED USING THE LIST-BASED AND DOWNTOWN PLAN METHODS

Subregional Zone	Guidelines Area%/a/ Guidelines Mode%/b/ Pte/c/		Downtown Plan Area% Guidelines Mode% from 1983/d/		Guidelines Area% Downtown Plan Mode% % Change from 1983		Downtown Plan Area% Downtown Plan Mode% % Change from 1983	
			Pte		Pte		Pte	
San Francisco Travel								
Drive Alone	42		39	-7%	106	152%	94	124%
Carpool, Vanpool	37		34	-8%	45	22%	40	8%
Transit	311		277	-11%	235	-24%	209	-33%
Other	40		39	-3%	43	8%	42	5%
Total	430		389	-10%	429	0%	305	-10%
Regional travel								
Drive Alone	46		55	20%	26	-43%	33	-28%
Carpool, Vanpool	52		57	10%	114	119%	128	146%
Transit	326		353	8%	279	-14%	305	-6%
Other	10		12	20%	6	-40%	8	-20%
Total	434		477	10%	425	-2%	474	9%
Total/e/	864		866		854		859	

/a/ Area% stands for the residential distribution used.

/b/ Mode% stands for the modal split used.

/c/ Pte stands for person trip-ends.

/d/ Percent change from results of using 1983 Guidelines Area% and Mode%.

/e/ Totals vary as a result of rounding.

SOURCE: Environmental Science Associates, Inc.

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and the employed population in San Francisco relative to the rest of the region continue to reflect the current patterns. On the other hand, the Downtown Plan EIR forecast approach accounts for changes over time in the relative availability of housing and labor force throughout the region. Under the Downtown Plan EIR forecasts, the percentage of downtown workers residing in San Francisco declines over time.

The basic assumption is that employment growth in San Francisco will exceed the growth of the City's employed population and that the growth of the City's employed population will not be proportional to the growth of the labor force residing elsewhere in the region. In other words, in the future, the relative importance to downtown jobs of the region's labor force residing outside of San Francisco will increase. This is consistent with long-term trends. Additionally, while it may appear that the changes between 1984 and 2000 for mode and residence patterns in the Downtown Plan EIR method are the sole reasons for the differences in the two methods' results, in fact, as with the change between the 1980 and 1983 Guidelines, the 1984 modal split and residence patterns in the Downtown Plan EIR are different from those in the 1983 Guidelines. The 1983 Guidelines present partial results of survey data (i.e., primary office), whereas the Downtown Plan EIR analysis uses composite data that incorporate travel from all land uses in the C-3 District. Thus, a portion of the change shown in the chart is a result of using a more complete data base than is available in the 1983 Guidelines.

In the case of Muni travel, the differences are attributable to the same three causes - differences in total trip generation, residence patterns and modal splits. Comparison of the travel assignment percentage for p.m. peak hour work travel shows Muni travel to the four San Francisco zones as follows:

<u>San Francisco</u>	<u>Muni Travel as a Percentage of Total P.M. Peak Hour Work Travel</u>		
	<u>Percent Change Between</u>		
	<u>1983 Guidelines</u>	<u>Guidelines and Downtown Plan EIR</u>	<u>Downtown Plan EIR</u>
Northeast	1.8%	4.6%	156%
Northwest	15.6%	5.9%	-62%
Southwest	12.2%	8.4%	-31%
Southeast	1.8%	4.3%	139%
Total	31.4%	23.2%	-26%

As shown in the chart, although the total Muni assignment differs by 26%, individual changes among the four zones vary as much as 156%. When coupled with the changes in other travel and the fact that the Downtown Plan EIR shows an increase in travel (see Table 2 of the Draft SEIR) that is 77% greater than the increase generated by the list-based analysis (as a result of the broader mix of land uses and longer time frame), it is not possible to apply a constant conversion factor. Regarding the percent change between the List-based results and the Downtown Plan results in Table 2 of the Draft SEIR, the range of the changes is from -88% for AC Transit to 300% for SamTrans.

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The distribution of workers by place of residence (the residence patterns for downtown workers) was an input to the transportation analysis using both the list-based approach and the Downtown Plan EIR approach. In the list-based approach, the inherent assumption is that the relative availability of housing throughout the City in the future would reflect current patterns. The residence patterns of downtown workers living in San Francisco using this approach were derived directly from the results of the 1982 C-3 District Employee Survey. On the other hand, the Downtown Plan EIR forecast approach included assumptions about how the relative availability of housing in different City locations would change over time. The residence patterns forecasts for C-3 District workers in the year 2000 which are used in the transportation analysis reflect this different assumption. The basic assumption is that there would be relatively more housing in the eastern parts of the City (near the downtown) in the future as compared to the current overall distribution. The City's Residence Element identifies opportunities for adding substantial numbers of units in mixed-use projects and redevelopment areas in this part of the City (see the Downtown Plan EIR, p. IV.D.60 and note 42).

The primary differences between the 1983 Guidelines and the Downtown Plan EIR are discussed above. . . . [U]nder the Downtown Plan EIR method, travel by mode for the project would be assigned using modal splits for the year 2000, whereas under the Guidelines, the project travel would be assigned to modes on the basis of modal splits for the years 1980 and 1983, respectively, as the Guidelines modal splits do not change over time. Additionally, . . . the Downtown Plan EIR projects total travel, not just travel from offices.

DEVELOPMENT FORECASTS

Comment

"V. THE MISSION BAY PROJECT MUST BE INCLUDED IN LISTS OF PROBABLE FUTURE PROJECTS.

"The Department of City Planning continues to violate its CEQA obligation to provide a reasonable list of probable projects by omitting the major single commercial project proposed for San Francisco -- Southern Pacific/Santa Fe's Mission Bay project. That project will be located immediately south of the Downtown core district on approximately 210 acres of land owned by Southern Pacific/Santa Fe. The I Hotel EIR should also take the Mission Bay project into consideration.

"SFRG challenges the omission of the Mission Bay Project from the Downtown Plan. It is not "too speculative" for the Department and the Mayor to be involved in executing planning agreements for that property.

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"On October 16, 1984, substantially before this DEIR will be certified as adequate, accurate and objective, Mayor Dianne Feinstein and James O'Gara, Vice President of Southern Pacific Land Co., entered into an agreement whereby Mayor Feinstein announced her support of Southern Pacific's proposal to construct 4,124,800 square feet of new office space, up to 2,600,955 square feet of "research and development" space and up to 201,000 square feet of retail space.

"When the SEIRs in the Court of Appeal decision were before the San Francisco Planning Commission on December 6, Commissioner Bierman questioned the Department's position that Mission Bay was too speculative. (TR 12/6/84 12:4) The Department's response was totally misleading: ' . . . we have not yet received any communication about any precise project from Southern Pacific. . . . The Mayor's discussions occurred last July. So, they still, as far as I know and as far as we know, are continuing to discuss what is an appropriate project down there, what is in their Master Plan.' (TR 12/6/84 12:23)

"This response is outrageous. The Mayor had signed an agreement two months earlier setting out the parameters of the Mission Bay project. Given the role of the Planning Director in those negotiations and given the fact that the Mayor's letter of agreement was a public document, the Department was not only aware of that letter, but also knew that the response given to Bierman was incorrect in that the Mayor had already set out specific square feet of new development which would be considered by the City for approval.

"In January 1985 the San Francisco Chronicle reported that the Mission Bay project 'is moving ahead again on a fresh basis of 'collaborative' planning between the railroad and the city.' Planning Director Macris, according to that article, has a key role in that planning effort, which will be financed by the railroad, but controlled by the City. That story reiterates the terms upon by the Mayor -- '6.7 million feet of offices . . . equivalent to 13 Transamerica pyramids' -- as the terms on which the project is being planned. According to that same article the planning process is due to be completed in 18 months. That means that project approval could occur before the end of 1986, and at least part of the construction could start soon thereafter.

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"Given the time frame for construction of new office space (as discussed in the Downtown Plan EIR) it is apparent that at least a portion of the Mission Bay project is a reasonably foreseeable project within the framework of CEQA and that its impacts on transit, transportation, air quality and housing, should have been included in the cumulative impact analysis.

"The other four Supplemental EIRs note that the Mission Bay project is tied to the amount of development in the downtown area analyzed in the SEIRs: 'Less development in the C-3 District would support the potential for more development in the other areas of San Francisco including Mission Bay. The policies of the Downtown Plan and the resultant high rents for C-3 District space would increase the demand elsewhere for lower rent space of the type that could be provided in Mission Bay. In other words, potentials for development in Mission Bay could evidenced sooner with the Downtown Plan than with continuation of current policies.' (LM SEIR p. 131, VP SEIR p. 129, CS SEIR p. 128, CC SEIR p. 133)

"The City's continuing failure to include Mission Bay in its analysis of cumulative development violates the law. As has been noted in the State's California EIR Monitor, in its discussion of San Franciscans for Reasonable Growth v. City and County of San Francisco (1984) 151 Cal. App. 3d 61, 198 Cal. Rptr. 634 in its February 15, 1985 issue, 'The holding in this case did not address the question of whether a lead agency must analyze the effects of publicly announced projects for which permit applications have not yet been filed. Although the courts may ultimately determine such projects are not 'reasonable foreseeable,' it may be advisable at this time to discuss such related projects in terms of cumulative impacts if the lead agency has been working closely with the prospective applicant, possesses special knowledge concerning the nature of the project, and understands that an application is forthcoming. Certainly the lead agency would have access to such information and could easily include the information in its' analysis of cumulative impacts. The effort required to include such information would certainly be less than or equal to that of discovering projects in other jurisdictions.' (California EIR Monitor, Vol. 12, No. 1, pp. 6,7)

"Given the magnitude of the proposed Mission Bay project, and given the critical nature of the environmental impacts identified in the SEIRs from the Court of Appeal decision and the Downtown Plan EIR on transportation alone, the omission of any analysis of Mission Bay is inexcusable. The Final I Hotel EIR must consider Mission Bay.

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"The following documents are in the Department of City Planning Files and SFRG incorporates them by reference:

"Letter to Board of Supervisors Requesting release of remaining \$550,000 for study from Dean Macris for Mission Bay Project - August, 1985.

"Mission Bay Study Work Program -- Program EIR, Central Waterfront Plan and Related Master Plan Amendments, Planning Code Amendments and Development Agreement. Draft July 19, 1985 and Final August, 1985.

"Letter of April 8, 1985 from Dean Macris, Planning Director to Jim Furth of the Mission Bay Clearinghouse.

"Letter of March 27, 1985 from James Augustino, Project Director to Dean Marcis, Planning Director.

"City Planning Commission Resolution No. 10254.

"Letter of October 16, 1984 from Mayor Diane Feinstein to James O'Gara, V.P. Southern Pacific Land Co. with attachment showing block by block land use map.

"January 1985 article from the San Francisco Chronicle.

"Board of Supervisors Resolution No. 345-85 approving use of funds for Mission Bay study from Santa Fe signed by Mayor Feinstein on 4/25/85.

"September 11, 1985 article announcing Mission Bay Study will be completed by the end of 1985.

"p. 21 of I-280 Concept Program City Staff Recommendation Full Report, June 1985 which suggests that elements of this project in the Mission Bay area be paid for by Mission Bay project sponsors, Santa Fe Southern Pacific Corporation.

"December 23, 1985 Memo from Alex Bash to Citizens re Mission Bay Status Report.

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"Enclosed is an article staff may not have: SF Examiner December 12, 1985 "Feinstein Aims to woo business at Soviet Talks (Appendix I of this document)." (Georgia Brittan, SFRG)

Response

No precise forecast or estimate of amounts and types of uses or transportation facilities and patterns was available for Mission Bay at the time the EIR was prepared, but the Downtown Plan EIR does account for development in the Mission Bay area that might occur by the year 2000. As noted on page C&R-B.38 [of the Downtown Plan EIR]: "The EIR analysis does not ignore 'half the downtown growth,' the growth in 'functionally -- connected areas,' the cumulative list of major projects, or Mission Bay...The effects of all of these plans and projects on the 'economic dynamics of downtown development,' are incorporated in the EIR analyses and C-3 District forecasts." (See e.g., [Downtown Plan EIR:] pp. IV.C.35-36, IV.C.50, IV.D.60, C&R-B.37-43, C&R-B.56-59, C&R-B.75-76, and C&R-B.77-78, and Note 42, IV.D.81d.)

Updated information is in order not only on the progress of Mission Bay planning but also on the effect of Proposition M on the Mission Bay proposal and on the South of Market Plan. The following response will, therefore, provide more recent information about these and other relevant studies.

The "Mission Bay Project" is part of an extensive public planning process underway in the Department of City Planning. The Department published the Mission Bay Plan, A Proposal For Citizen Review in January, 1987. Following public review and possibly staff revisions, and following preparation of an Environmental Impact Report (EIR), adoption of the Plan would require amendments to the Central Waterfront Plan of the City's Master Plan by the City Planning Commission, and would require approval of amendments to the City Planning Code and Zoning Map by the City Planning Commission, the Board of Supervisors, and the Mayor. The proposed Plan could also lead to a Development Agreement between the City and the sponsor, Santa Fe Pacific Realty Corporation. Any development agreement would also require action by the City Planning Commission, the Board of Supervisors, and the Mayor. Review and approval of development at the Mission Bay site would also require action by the

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Bay Conservation and Development Commission, Metropolitan Transportation Commission, and possibly the Army Corps of Engineers, Coast Guard, and the Regional Water Quality Control Board. If all of these actions were to result in approvals, an overall framework for phasing of development in the area would be established. Precise construction permits would still be required in order to permit actual construction and later occupancy of the first buildings in the Mission Bay project area.

Thus, the process to permit major new development in the Mission Bay area is a lengthy one. It is highly unlikely that all approvals would have been obtained and the area substantially developed by the year 2000.

In undertaking the Mission Bay planning effort, the City has accepted funds from Santa Fe Pacific to prepare planning studies. In resolutions accepting those funds, neither the City Planning Commission nor the Board of Supervisors has made any commitment to approve any development in the Mission Bay area. Board Resolutions No. 345-85 and 58-86 each state: "It is the intent of the Board of Supervisors that adoption of this resolution not constitute an approval of or comment upon any agreement or memorandum of understanding between the City and Santa Fe Pacific Realty Corporation not expressly approved by the Board of Supervisors."

On September 19, 1986, Santa Fe Pacific submitted an application requesting environmental review of their proposed plan/project (case no. 86.505E). This proposed project reflects the land use program outlined in a letter, dated October 16, 1984, from Mayor Feinstein to the Southern Pacific Land Company (commonly referred to as the Mayor's letter), as modified by a letter of May 17, 1986. The Santa Fe Pacific proposal would involve the construction of about 7,700 housing units, about 4.1 million sq. ft. of office space, about 2.6 million sq. ft. of research and development space, about 235,000 sq. ft. of commercial/retail space, a 500-room hotel, and about 74 acres of public open space on the 295-acre site.

Background studies for this major area-wide EIR are underway, accompanying the planning effort. This EIR will analyze five alternative development scenarios, including the Santa Fe Pacific proposal and four additional alternatives covering a wide range of land use mixes for the Mission Bay area. Each of these alternatives

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would include improvements to the street network and transit systems, both within the Mission Bay area and in its vicinity. A description of the five alternatives is available from the Department's Mission Bay staff.

Santa Fe Pacific's current proposal, as outlined in the application for environmental review, is to proceed with construction in a number of phases. The first phase (the only phase described in the application) would include office space in the block bounded by Third, Townsend, Fourth and King Streets, and residential units in the area south of China Basin between Third and Fourth Streets. Because the Mission Bay development proposal is not like a typical development for a single building, the initial application requesting environmental review does not provide the same level of detail about building sizes, uses, design, and amenities that is normally provided. Design information for individual buildings does not yet exist. These individual buildings would require further details and could be subject to further environmental review before building permits were issued. It is not expected that individual buildings would be built and occupied and the space absorbed until sometime in the 1990s.

The Department's Proposal for Citizen Review includes types of uses similar to those proposed by Santa Fe Pacific, but in different amounts and, insofar as detail is available in the Santa Fe Pacific application, in different configurations. The land use program contains 7,700 to 7,960 housing units; 3.6 to 4.1 million sq. ft. of office space; 2.3 to 2.6 million sq. ft. of service/industrial/research and development space; 300,000 sq. ft. of retail space; a 500-room hotel; 70 to 78 acres of open space; and reserves an area for a ballpark. Maps of the locations of these uses are available from the Department's Mission Bay staff.

Preliminary to preparation of the Mission Bay Plan, the Department prepared 19 special planning studies on a variety of topics. These Mission Bay Special Studies were prepared and presented in the summer and fall of 1986 and were used by Department staff and consultants in preparing the Plan. In general, they cannot be used for other purposes; in particular, they cannot be used to update the cumulative impacts analysis provided in the Downtown Plan EIR.

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An attempt has been made by some to compare the year 2000 Downtown Plan EIR forecasts of C-3 District growth and generalized estimates of growth through 2000 in the rest of the greater downtown area to the preliminary scenarios of cumulative employment growth in greater downtown San Francisco used in the Mission Bay Special Studies. Based on this comparison, questions have then been raised regarding differences in transit and traffic demand between the Downtown Plan EIR and the Mission Bay Special Studies.

It is important to understand some basic facts about the scenario of downtown employment growth used in the special studies. The scenario consists of order-of-magnitude estimates of future growth for the various subareas of the greater downtown: the C-3 District, South of Market, Northeast Waterfront, Civic Center, and the Mission Bay areas. These estimates were prepared in summer 1986. They were preliminary for use only in the Mission Bay Special Studies and are being refined for the Mission Bay EIR. (For more background, see Appendix C in the Transportation Network special study; an August, 1986 memorandum from Recht Hausrath & Associates to the Department of City Planning regarding "Preliminary Greater Downtown Estimates for Mission Bay Planning.")

The scenario of future downtown growth is labelled 2000+ in the special studies. This indicates two things. First, it indicates that the estimates are preliminary, without the supporting analysis to tie them to any one particular year. Second, the labelling reflects the decision to incorporate an estimate for Mission Bay representing full build-out of the project area in order for the special studies to address the full impacts of Mission Bay. Project build-out is not expected to occur until some time well beyond the year 2000. Thus, the 2000+ preliminary estimates are expected to occur sometime beyond the year 2000. This is acknowledged in footnote 1 of Table 5 in the Transportation Network special study.

Because the growth scenario used in the special studies is for 2000+ (and is so labelled, on both Table 19 on the CalTrain Station Locations special study, and Table 5 in the Transportation Network special study), it can be expected to represent a larger amount of employment growth than a corresponding forecast for the year 2000.

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Nevertheless, the 2000+ scenario incorporates, in its entirety, the year 2000 Downtown Plan EIR C-3 District employment forecast of 376,420 (372,120 permanent employment plus 4,300 construction jobs). Therefore, the number of C-3 District workers used in the special studies analyses is the same as that used in the Downtown Plan EIR, not larger as alleged in the comment.

While the Downtown Plan EIR did not forecast growth for areas outside the C-3 District, the forecasts did account for employment increases in the greater downtown and the rest of the City. The preliminary scenarios used for the Mission Bay Special Studies do not contradict these estimates. For the non-C-3 District areas of the greater downtown, the preliminary scenario for 2000+ reflects growth from 1985 of either 45,000 or 57,000 depending on the Alternative for Mission Bay. As noted above, it is expected that Mission Bay build-out would occur beyond the year 2000, so growth up to 2000 would be less than these amounts. This magnitude of non-C-3 District growth is within the range of the growth potential through the year 2000 for the greater downtown areas outside the C-3 District presented in the Downtown Plan EIR. The somewhat larger amount of growth associated with the build-out of one of the two Mission Bay Alternatives used in the special studies is expected to occur after the year 2000+ and will be evaluated in the Mission Bay EIR.

The use of 1985 as the base year for the Mission Bay Special Studies (and as the setting year for the Mission Bay EIR) raises some complications for comparisons to the Downtown Plan EIR such as those attempted by the commenters. The work for the Downtown Plan EIR was done when the most recent Citywide employment data available were for the year 1981. Surveys, interviews, and other analyses were conducted in 1981 and 1982 to establish an estimate of C-3 District employment in 1981. Most of the Downtown Plan EIR setting text and tables describing land use, space use, and employment conditions are for the year 1981. Other tables present estimates for the year 1984. The employment estimates presented in the EIR for 1984 are simple extrapolations of the forecast growth from 1981 through 2000.

The Department now has Citywide employment data for 1984 and 1985. With analysis of recent trends in employment and space use, consultants were able to develop an

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estimate of C-3 District employment for 1985. These analyses have indicated that the short-term C-3 District growth from 1981 to 1984 presented in the Downtown Plan EIR did not occur. (The likelihood of this outcome is acknowledged in the Downtown Plan EIR. See Downtown Plan EIR, Vol 1, pp. IV.B.15 - IV.B.16, p. IV.C.26, note /22/ on p. IV.C.58, and Vol. 2, Appendix H, p. H.7.) The 1981 estimate of C-3 District employment presented in the Downtown Plan EIR has not changed as a result of the more recent analyses done to provide a comparable estimate for 1985. The 1985 estimate follows from the 1981 estimate and replaces the 1984 projection presented in the Downtown Plan EIR. Table C&R 2, below presents the relevant numbers used in this discussion of the Mission Bay Special Studies. Table C&R 2 shows that the 1981 and 2000/2000+ C-3 District total are the same when obtained from either the Downtown Plan EIR or the Mission Bay Special Studies. The difference is in the timing of the 1981-2000 growth. As discussed above, the updated estimate for 1985 indicated that C-3 District employment growth from 1981 to 1984

TABLE C&R 2: COMPARISON OF C-3 DISTRICT EMPLOYMENT ESTIMATES FROM
THE DOWNTOWN PLAN EIR AND THE MISSION BAY SPECIAL STUDIES

<u>Downtown Plan EIR</u>			<u>Mission Bay Special Studies</u>		
1981	270,370	(derived from published data)	1981	270,370	(derived from published data)
1984	286,130	(estimated from simple extrapolation 1981-2000 forecast)	1985	264,760	(derived from published data)
2000	376,420	(forecast)	2000+	376,420	(forecast)
Change 1981-2000	+106,050		Change 1981-2000+	+106,050	
Change 1981-1984	+15,760		Change 1981-1985	-5,610	
Change 1984-2000	+90,290		Change 1985-2000+	+111,660	

NOTE: The estimates in this table include both employment and annual average construction employment.

SOURCE: Recht Hausrath & Associates

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did not occur as projected in the Downtown Plan EIR. In fact, employment declined. Since the forecast total used for 2000/2000+ is the same, this simply means that the growth needed to reach the forecast total in the C-3 District shifts to the later (1985-2000) period for these special studies.

Because of this difference between the 1984 projection in the Downtown Plan EIR and the updated amount of C-3 District employment estimated for 1985, it is not correct to subtract the 1984-2000 increase in C-3 District employment presented in the Downtown Plan EIR from the preliminary 1985-2000+ scenario for the greater downtown presented in the special studies to derive an estimate of the employment growth for the non-C-3 areas used in the special studies. This calculation is presented in the fourth paragraph of the comment. The 1984-2000 increase in C-3 District employment shown in the Downtown Plan EIR is not comparable to nor a portion of the 1985-2000+ scenario of the greater downtown plus full build-out of Mission Bay; therefore subtracting one from the other will not produce a usable number.

The correct way to derive the estimates of growth outside the C-3 District is to use the information by area presented in Table 5 of the Mission Bay Transportation Network Special Study. The non-C-3 District growth can be calculated in two ways: either as the difference between the total greater downtown growth and that indicated for the C-3 District, or as the sum of the growth shown for the individual non-C-3 District areas (South-of-Market, Northeast Waterfront, Civic Center, and Mission Bay). The result of either of these calculations is the estimate of growth ranging from 45,000 to 57,000, depending on the Mission Bay scenario. The commenters derive correctly the high end of this range in the fifth paragraph of their comment, neglecting to cite the lower end (45,000) of the range.

In summary, there are three conclusions to be drawn from this explanation. First, the difference between the Downtown Plan EIR and the Mission Bay Special Studies in non-C-3 District growth is not larger as alleged in the comment. Second, all the Mission Bay Special Studies used the same preliminary estimates of growth for the C-3 District and the rest of the greater downtown, not two different sets of numbers as implied by the commenters. Third, the 2000+ scenarios in the Mission Bay Special

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Studies account for full build-out of Mission Bay beyond the year 2000; therefore a corresponding growth scenario for the year 2000 would be within the range of the non-C-3 estimates in the Downtown Plan EIR. Full build-out of Mission Bay (beyond 2000) will be evaluated in the Mission Bay EIR.

With this detailed explanation, it becomes clear that the special studies, prepared for planning purposes, are not appropriately used to update cumulative analyses in the Downtown Plan EIR. When the Mission Bay Draft EIR is prepared and published, it may provide such an update.

Following preparation of employment estimates for the Mission Bay Special Studies, considerable time was spent preparing and refining forecasts of employment for the greater downtown area, including Mission Bay, for 1985-2000. These forecasts include employment expected in the portion of Mission Bay development expected to be built, occupied, and absorbed over that time frame. Essentially final forecasts were received in mid-February. While they may be revised slightly between now and publication of the Mission Bay Draft EIR in fall of 1987, they are not expected to be significantly different. The forecast results show that, based on employment decline in the C-3 District from 1981-1985, total future employment in the C-3 District in 2000 is likely to be lower than was forecast for the Downtown Plan EIR. Depending on the alternative development scenario used for Mission Bay, C-3 district employment in 2000 would range from about 331,150 to about 331,525, a net increase of about 69,180 to 69,550. Total greater-downtown employment, including Mission Bay, is forecast to range from 439,891 to 444,547, a net change of 98,158 to 102,814. (This information is found in a Memorandum from Recht Hausrath & Associates to Alec Bash and others dated January 23, 1987, and revised February 12, 1987.) This new employment information shows that employment forecasts used in the Downtown Plan EIR overestimated the amount of employment likely to be found in downtown in the year 2000. This probably means that some impacts were also overestimated in the Downtown Plan EIR. Both the employment growth and associated impacts would be likely to occur further in the future, several years after the year 2000.

The Department has also prepared and circulated the South of Market Plan: Proposal for Citizen Review (June 1985). As with Mission Bay, implementation of this or a

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revised plan would require an amendment of the City's Master Plan by the City Planning Commission and approval of ordinances amending the City Planning Code and the Zoning Map by the Commission, the Board of Supervisors, and the Mayor. Interim controls, based on the Plan with some modifications, were adopted on October 21, 1986, for an eighteen-month period. Unlike the Mission Bay Plan, the result of adoption of permanent controls would not be a development agreement for construction of a specific list of buildings and amenities. Therefore, the environmental analysis of the South of Market Plan will be at a somewhat more general level than the analysis in the Mission Bay EIR. The EIR for the South of Market Plan is being prepared by Department staff, using some materials from specialized consultants. Estimates of employment growth to the year 2000 under the South of Market Plan have been prepared for the South of Market EIR. The estimates for this planning area alone show an increase of less than 8,000 permanent jobs and an increase of approximately 1.3 million sq. ft. of occupied and absorbed building space for all land uses. Most of this increase in space occupancy -- greater than 60% -- is expected to result from occupancy of existing vacant or underutilized space. When viewed in relation to the greater downtown, including Mission Bay, the South-of-Market area contribution to cumulative growth is relatively limited.

Proposition M, approved by the voters in November 1986, would limit the amount of office space that could be developed in both the South-of-Market area and the Mission Bay area because the proposition imposes a limit on the total amount of office space that can be approved in any one year in the city. Therefore, overall cumulative effects resulting from office employment would probably be somewhat reduced compared to those estimated without Proposition M. The EIRs for the two planning areas will assume development without Proposition M constraints on office space expansion in those areas in order to provide disclosure of the greater impacts that could result without the growth limitation. However, if Proposition M remains in effect, employment growth related to office development in both areas is likely to be slower than either the amount forecast in the respective EIRs or the amount estimated in the Downtown Plan EIR for the areas outside the C-3 District.

Neither of the environmental analyses on the two planning areas are near publication. The South of Market Area Plan Draft EIR is expected to be available in

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the summer and fall of 1987; the Mission Bay EIR will probably be available in fall 1987. Therefore, detailed cumulative environmental impact analysis is not available as of publication of this document. However, on the level of regional cumulative development, there are methods for predicting, in a general way, the transportation impacts of expected growth in regional economic activity, including activity at Mission Bay, for example, before Mission Bay EIR analyses are completed and published. Forecast methods, such as that used in the Downtown Plan EIR and in this EIR, account for this kind of potential, but somewhat speculative and non-specific, development. In the absence of precise forecasts or estimates of amounts and types of land uses or transportation facilities and patterns in the area, the Downtown Plan EIR accounts for development which might occur in the area by the year 2000. For example, as noted on p. C&R-B.38 of the Downtown Plan EIR: "The EIR analysis does not ignore 'half the downtown growth,' the growth in 'functionally connected areas,' the cumulative list of major projects or Mission Bay. . . The effects of all of these plans and projects on the economic dynamics of downtown development are incorporated in the EIR analyses and C-3 District forecasts." (See also, e.g., Downtown Plan EIR, pp. IV.C.35-36, IV.C.50, IV.D.60, C&R-B.37-43, C&R-B.56-59, C&R-B.75-76, and C&R-B.77-78, and Note/42/, IV.D.81d.)

To require that the regional cumulative impacts of alternative development scenarios be fully analyzed for the Mission Bay planning area or the South of Market planning area as part of an EIR on an individual building proposal in the greater downtown area prior to availability of such an analysis in an EIR on the respective planning areas themselves would be a de facto moratorium on building approvals until those EIRs on planning areas were completed. A more reasonable approach is to use the cumulative impact analysis available in the Downtown Plan EIR until a more detailed and final analysis of cumulative impacts, specifically including the South of Market Plan and specifically including the Mission Bay project, is prepared, and to incorporate preliminary information from the Mission Bay and South of Market planning efforts as that information becomes available in usable form. As explained above, there is no new analysis available with which to update the information provided in the Downtown Plan EIR on cumulative impacts of development. Based on preliminary employment estimates for 1985, it seems clear that the employment forecasts in the

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Downtown Plan EIR, on which much of the cumulative analysis was based, were conservative and may have somewhat overestimated employment growth over the analysis timeframe.

Over the past several months, additional data has been released by transportation agencies that should be reviewed and provided for informational purposes. BART ridership declined following a fare increase in January 1986, Bay Bridge p.m. peak traffic increased between 1982 and spring 1986, and Golden Gate Transit has announced a reduction in service due to ridership declines and related income losses. The Golden Gate Transit situation may change in the near future, however, as a ballot measure is planned to request a sales tax increase in Marin/Sonoma by one-half cent, to six and one-half cents, for transit purposes similar to other Bay Area counties.

Transportation conditions are fluid and are subject to constant fluctuation due to circumstances that cannot always be detailed, but which affect travel behavior. Since transportation analyses evaluate a fixed set of circumstances, they cannot account for all possible changes in travel variables. Often such changes have a "push-pull" relationship over the short term, whereby they generate improved operating conditions on one part of the overall transportation system at the expense of the operating conditions of another part.

This back-and-forth relationship is illustrated by recent changes in traffic flows and transit use in the East Bay/San Francisco corridor. Data from the Metropolitan Transportation Commission through spring 1986, indicate that Bay Bridge vehicle volumes have increased between 1982 and early 1986. At the same time, beginning in January 1986, BART ridership declined. Thus, service levels on BART improved for the remaining passengers at the same time that bridge traffic increased.

Transportation experts have advanced several reasons for the shifts. Increased driving is probably due in part to the drop in gasoline prices, particularly for drivers travelling longer distances who would be most discouraged from considering transit as an alternative. At the same time, BART fares increased by 30%, adding to the economic incentive. BART average weekday patronage reached its lowest point in June 1986, and has been increasing since then, although levels have not yet returned to pre-fare increase levels. It is interesting to note that gasoline prices have also

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gradually increased since September 1986, although there is no statistical measure of correlation between ridership and fuel prices. There is also no new information on Bay Bridge travel since spring 1986, so it is not known whether increases in BART patronage have been accompanied by decrease in bridge traffic.

The Bay Bridge traffic had actually increased beyond calculated design capacity as of spring 1986. This could be due to changes in driver behavior (e.g., that drivers are driving faster within closer proximity to each other) and acceptance of higher congestion levels than were factored into Caltrans' definition of capacity.

AC Transit has also experienced a drop in transbay patronage, due in part to an increase in "casual" and formal carpooling. Though more pronounced in the morning westbound direction, patronage has also declined in the evening eastbound direction.

The cost advantages of money and time (no bridge toll or bus fare, usage of HOV lanes, no waiting for buses) make carpooling particularly attractive. It is likely that reduced BART ridership, particularly from Contra Costa stations, is also partially due to increased carpooling. Some of the drop in transit patronage is also likely to be attributable to the drop in employment in downtown San Francisco over 1981-1985.

Within the context of long-term forecasts and impact analyses, it should be anticipated that contrary short-term fluctuations will occur. As freeway congestion and fuel prices increases, the incentive will shift towards transit and ridership will increase. It is simply not possible to account for all of these short-term changes in transportation mode in preparing a long-term analysis of cumulative transportation impacts resulting from employment growth.

ALTERNATIVES

ALTERNATIVE C -- PRESERVATION ALTERNATIVE

Comment

"Note that alternative C is illegal." (Chinatown Resource Center)

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Response

Comment acknowledged. The last sentence on p. 166 of the EIR is revised, and a new sentence is added to follow (new language is underlined):

Under this alternative, the eight-story structure on B-Site would cast new shadow on Portsmouth Square one hour after sunrise on June morning. Alternative C could violate Proposition K, the Park Shadow Ban ordinance which specifies that no new building can cast any new shadows on public open space owned by (or designated for acquisition by) the Recreation and Park Department, unless the Planning Commission and the Recreation and Park Commission find that the shadow is not "significant."

Comment

"Other preservation alternatives need to be developed. Alternatives which save the Colombo Building by eliminating housing and/or which retain the Colombo Building by excessive height on site A are not sufficient." (Mark Ryser, Heritage)

"Page 166, Paragraph 3. Would this Preservation Alternative, as described, require a reclassification of the height district which is not required by the project sponsor's preferred proposal?" (Jonathan Malone, LPAB)

Response

Because projects often evolve over the course of review by the public and City agencies, the alternatives included in the EIR are intended to establish a range of impacts which would be likely to result from various public actions on the project, rather than to define precise, mutually exclusive, sets of project characteristics. The EIR also describes the localized impacts of development on the two sites independently. Based on this EIR, the Commission could, for example, consider B-Site as it is described under Alternative C and A-Site as described under another alternative. It could also consider B-Site as described in the No-Project Alternative and development on A-Site.

Alternative C includes preservation of the Colombo Building. As stated in the first sentence of the second paragraph on p. 166 of the EIR, it would include 120 residential units (as for the proposed project). Alternative C would have two more

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stories on A-Site and more bulk than the proposed project but would still be within the allowed height limit of the 65-D-2 Height and Bulk District. The commenter does not suggest a specific alternative preservation scheme. The range of alternatives presented in the EIR satisfies CEQA requirements.

ALTERNATIVE E INCREASED HOUSING

Comment

"Alternative E in the Draft Environmental Impact Report comes closer to addressing the housing impacts of the project at a scale more compatible with the neighborhood. It should be given much more serious consideration that was shown in the DEIR." (Edwin Lee, Lorraine A. Lowe, and Alton Chin, CCBH)

"Why not more housing?" We recognize that some community representatives have joined in the negotiations which lead to the approximate 120 housing units being built in this project (with significant City funds). Nonetheless, we would prefer an alternative of all housing on this site, rather than more office space. As you well know, 240 units of housing were eliminated ten years ago from this site, so building 120 units now does not seem that great. More importantly, there is a great need for housing in that area but there is not a great need for office space.

"We understand that there is inadequate documentation to support the developer's view that they must have this much office space in order to provide the housing." (Dick Grosboll, SFT)

Response

Alternative G, (see p. 370) is the project sponsor's preferred alternative. Alternative G would have six more residential units than the DEIR project, and less office space.

Economic justification is not part of the environmental review process. Demand for office space and office vacancy is discussed on pp. 270 to 284.

ALTERNATIVE F CHINATOWN RESOURCE CENTER AND ASIAN NEIGHBORHOOD
DESIGN ALTERNATIVE

Comment

"Along with Asian Neighborhood Design, we have prepared an alternative for consideration in the Final EIR, and as a sincere attempt to facilitate a development which better meets the needs of both the community and the project sponsor." (Cynthia Jones, Chinatown Resource Center)

"Our purpose in coming before you and presenting to you an alternative is in the spirit of the information you need to know to make a sound judgment that all the reasonable alternatives that might have been accommodated on this site within the broadest range of environmental possibilities have been adequately examined.

"I think many of us are aware, and I will repeat, of the efforts of the committee (I-Hotel Citizens Advisory Committee) itself to try and come to some conclusion about what a viable project would be. Nonetheless. I think if you look on Page 172 of your own alternatives in the Draft EIR, you will see that the range of alternatives other than the project sponsor's preferred alternative, vary quite substantially in terms of the mix of office space and residential space. There is not an alternative here in the list that, say, gives the developer maybe 75 or 80 percent of the office space they were looking for and holds the residential numbers at the preferred numbers that the committee arrived at, at 53,700.

"So we would propose another alternative, maybe you'd call it Alternative F. The purpose in doing this is to address some of the issues that have been raised by other people. This is not at this point that myself or my organization wants to be taking a position. Because, in fact, what we are simply saying is that we think we need further study of this alternative.

"[T]he buildings right behind the middle of the site -- that is, where we are proposing a residential tower and where the sponsor is proposing a 200-foot building -- do have windows there feet away from the property line. Although it's not a residential building, it's a building of residential scale. And by putting a residential building behind it, we allow those windows to have light and air.

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"We do agree that some of the project alternatives in the EIR have been developed to be so extreme that they're indeed unreasonable. And when you're comparing one reasonable to five, quote, unreasonable ones, it doesn't give you enough information to make a sound judgment." (Tom Jones, AND)

"INTRODUCTION: Asian Neighborhood Design has proposed an alternative to the sponsor's proposed alternative for the International Hotel site. An economic analysis of the proposal has been performed by the Center for Community Change. This memorandum, prepared by the staff of the Chinatown resource Center, is intended to briefly summarize the proposed alternative and to address its feasibility.

"THE PROPOSED ALTERNATIVE: The proposed alternative consists of three buildings, with two (on A Site) sharing a common base. The sponsor's proposed office tower on B Site remains unchanged, as do the square footage unit mix and affordability of the proposed housing.

"A Site would contain two 85 foot structures. Above ground floor retail, 57,300 sq. feet of office would be located at the Jackson/Kearny intersection with 120 units of housing located mid-block on Kearny (see attached schematic and floor plan).

"Location of the office space at reduced scale on the corner, rather than mid-block as proposed by the sponsor, offers significant advantages. The office building has a larger floor area than in the sponsor's design and less chamfering at lower floors is necessary. The corner location offers more peripheral windows, better views, and an increased association with the prestigious Jackson Square area. While the proposed alternative requires an overall reduction of 20% of the proposed gross office space footage (from 178,100 sq. ft. to 138,600 sq. ft), the office tower on Kearny is significantly more efficient at the reduced height. The lower building requires none of the space-intensive life-safety features (extra elevators, exits, sprinklers, etc.) required for the high-rise office preferred in the Draft Environmental Impact Report. Thus, the reduction in net office space is much less than the reduction in gross office space, and design features such as bays could reduce this loss further. The location of the residential structure in this alternative allows for a greater number of rooms to be on an inner court, away from

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the street traffic, than in the proposed design. Additionally, the courtyard formed by the office building and residential building is larger and preserves grater light and air to windows existing midback rear building.

"ECONOMICS: The Center for Community Change has performed an analysis of the ability of the alternative proposal to subsidize the housing relative to the sponsor's preferred alternative. This memorandum summarizes the findings of that study.

"In both scenarios, the total cost of the housing is estimated at \$5 million (Pan Magna Draft EIR, March 14, 1986, page 35), and the City subsidy remains constant at \$1.5 million. In the sponsor's proposal, an Office Affordable Housing Production Program requirement of \$920,028 is incurred, while the reduced office space in our proposal correspondingly reduces the OAHPP requirement to \$740,124. Thus, sponsor's contribution - above and beyond fees and City subsidy - becomes either \$2,579,972 (sponsor's alternative) or \$2,759,876 (our proposal).

"At 10.5% financing over a thirty year term, monthly debt service comes to \$23,600/month under Four Seas' plan, or \$1.182 per sq. ft. of commercial space (office and retail) per month. (Note that the DEIR proposes tax exempt financing, which would significantly lower this cost).

"So, under Four Seas' proposal, \$1.41 per sq. ft. per year - out of \$26-\$32 per sq. ft. per year - would go to housing subsidy.

"Using the same methodology, our proposed alternative would necessitate a subsidy to the housing of \$2,759,876. At 10.5% over 30 years, the monthly debt service equals \$25,245 or \$.1606 per sq. ft. per month - \$1.93 per year per square foot.

"The difference in the cost of housing subsidy under the two schemes is \$.52 per sq. ft. per year, an insignificant amount given a rental range of \$26-\$32 per sq. ft. per year for office and \$28-\$36 per sq. ft. per year for retail space.

"Over the term of the mortgage, rents can be expected to increase while debt service remains fixed resulting in a diminishing fraction of rental income devoted to amoritizing the housing debt.

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"PROPOSED ALTERNATIVE FOR THE INTERNATIONAL HOTEL SITE

KEY FEATURES: * Retains proposed housing
* Provides two 85' buildings on Kearny Street
* Design is more compatible with surrounding scale
* Reduces total office space by 20%
* Offers reasonable return to developer

	4 SEAS PROPOSAL	ALTERNATIVE
OFFICE	178,100 sq. ft.	138,600 sq. ft.
RETAIL	21,600	18,600
LOBBY	5,500	5,500
COMMUNITY SPACE	0	5,000
RESIDENTIAL	53,700	53,700
MECHANICAL	8,000	6,000 estimated
Site A	96,800 sq. ft. office	57,300 sq. ft. office
Site B	81,300 sq. ft. office	81,300 sq. ft. office"

[Commenters also submitted two graphics; see pp. 361 and 362.]

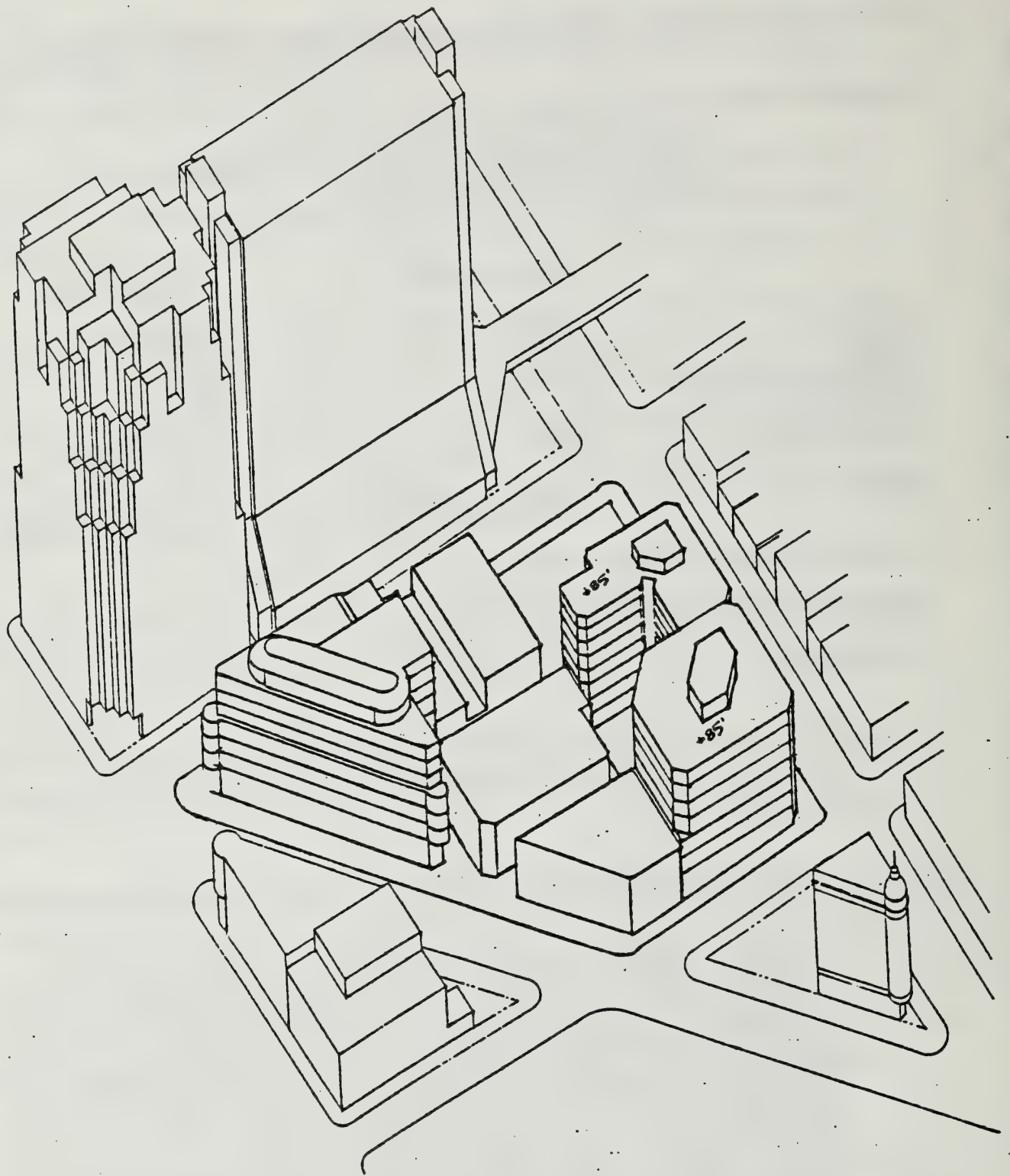
(Chinatown Resource Center & AND)

Response

The Chinatown Resource Center and Asian Neighborhood Design have developed their own alternative for the project. The following is added to the EIR, to follow p. 172 (with a summary on p. 14).

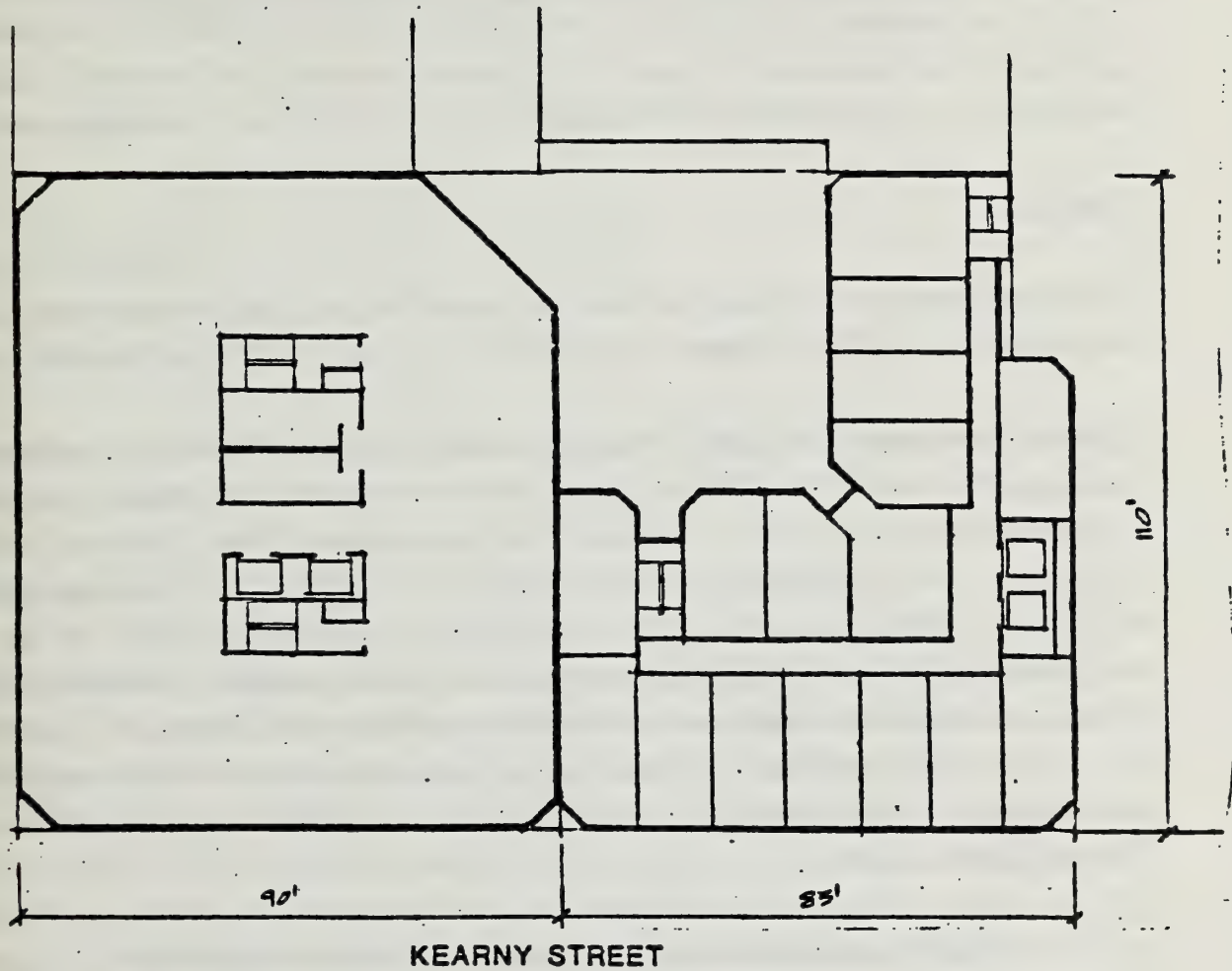
F. CHINATOWN RESOURCE CENTER AND ASIAN NEIGHBORHOOD DESIGN ALTERNATIVE

Alternative F would consist of three buildings, two of which would share a common base on A-Site. The building on B-Site would be the same as with the proposed project. The configuration of the building on A-Site would be similar to Alternative E. A-Site would consist of two 85 ft.-tall towers. The tower at the corner of Kearny and Jackson Streets, would contain 57,300 sq. ft. of office space over retail space and the other tower, directly behind the office tower, would contain 53,700 sq. ft. of residential space (120 units as for with project). The residential structure would also contain retail space, community and lobby space. Alternative F would have about 20% less office space than the DEIR project; 18,600 sq. ft. of retail space, 5,500 sq. ft. lobby and 6,000 sq. ft. of mechanical space as compared to 21,600 sq. ft. retail, 5,500 sq. ft. lobby and 8,900 sq. ft. mechanical as with the proposed project.



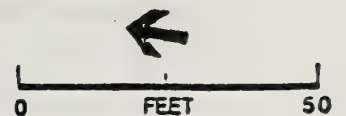
ALTERNATIVE

JACKSON STREET



OFFICE: 6 STORIES @ 12'-0" ±
RETAIL/LOBBY/PARKING
ENTRY: 1 STORY
85'-0" HEIGHT MAX.

HOUSING: 8 STORIES @ 8'-6" ±
RETAIL/LOBBY/COMMUNITY
SPACE: 1 STORY
85'-0" HEIGHT MAX.



SOURCE:

A-SITE
TYPICAL FLOOR PLAN

X. Summary of Comments and Responses

Because of the reduction in office space of this alternative compared to the project, transportation, air quality, housing demand, and other impacts would be proportionately reduced. Wind impacts would be similar to those of the proposed project.

The project sponsor has rejected this alternative as he considers that it would be less aesthetically attractive than the project or Alternative G.

HOUSING ON BOTH A- AND B-SITES

Comments

"If they are going to tear down the building, I would like for it go to replace the elderly housing and physically challenged housing that is not there now." (Lisa Huggins)

"Given the comments that are on Page 80 with respect to the urban design issues and the comments that are on Page 36 with respect to the criteria that would have to be met for Conditional Use Authorization to increase the heights above 65 feet, I think an additional alternative is worth exploring, and I would like to see us explore an alternative which would have no office space in it at all, would have only subsidized housing, and that the funds that would be looked at for a source of that financing would be those that are proposed in this project plus those that were proposed as a source from the federal government in what was formerly known as the Orangeland Project, which funds I understand are now available for an alternative siting." (Toby Rosenblatt, President, City Planning Commission)

"p. 163. Please include an all housing alternative." (Georgia Brittan, SFRG)

Responses

An alternative including subsidized housing for elderly and physically handicapped persons on both A- and B-Sites with no commercial uses would be improbable because funding is not available. Funding previously allocated to the Orangeland project is proposed to be used by the Pineview Housing Corporation for development of a project at Broadway and Mason Streets. An FEIR for that project was certified, and

X. Summary of Comments and Responses

that project was approved by the Planning Commission on April 2, 1987. The HUD grant funding for that project requires construction to be underway by October 1987. It would be unlikely that Pan Magna Plaza could be redesigned to accommodate those additional units, undergo environmental review, complete the approval process and be under construction by that time. CEQA Section 15126(d(5)) stipulates that, "An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative."

LOADING ON B-SITE

Comment

"Include alternative with loading dock added in Site B." (Toby Rosenblatt, President, City Planning Commission)

Response

The inclusion of a loading dock on B-Site would result in the loss of approximately 800 sq. ft. of ground floor retail space adjacent to the proposed parking entrance on Washington Street, or loss of four to five parking spaces in the basement.

As stated in the EIR in the first sentence on p. 126, B-Site would not be required to provide any loading space under the City Planning Code. One loading space would be required and provided on A-Site with the EIR project (and Alternative G). The project sponsor would request the Department of Public Works to designate the curb on Washington Street adjacent to B-Site as a loading zone to meet loading demand generated by B-Site development. The inclusion of a loading dock on B-Site would not result in measurably different project impacts on the street system. A loading dock could be required by the City Planning Commission as a condition of approval.

X. Summary of Comments and Responses

SPONSOR'S REASONS FOR REJECTION

Comment

"For them (the developer) to cry economic, not economically feasible, it's because they want a 200 percent profit, and if they scale it down, unless they do it the right way with an alternative, they'll only get 100 percent profit." (Joe Kaufman)

"Alternatives proposed. 'The DEIR alternatives are rejected for not offering a reasonable return on investment capital.' Please define." (Chinatown Resource Center)

Alternatives. NOMPC strongly supports alternative E., the Increased Housing Alternative that would provide two housing towers, at 75 feet, on Kearny Street with enough housing in the Columbo Bldg. site to meet the 271 unit replacement requirement and the smaller, remaining O/HPP requirement.

"The owner rejects this alternative as 'economically infeasible'. Need we remind the commission that the developers of 212 Stockton rejected a smaller alternative as economically infeasible just as L.A. developer Sheldon Gordon rejected anything under 825,000 s.f. at Fifth and Market as 'economically infeasible'. The Final EIR must define what a reasonable rate of return is to the developer and base statements on economic feasibility on that or state, more honestly, 'the developer doesn't like this alternative.'"

"On this last point we cannot overemphasize the growing need for the Department to take a more active role in judging economic feasibility. Relying on the developer's unsubstantiated assertion that an alternative is 'economically infeasible' throws the credibility of the entire document into increasing question following the Commission's experience with 212 Stockton when the current developer now proposes a substantially smaller project that will still make money." (Bradford Paul, NOMPC)

Alternatives. The alternatives discussion is inadequate because alternatives are rejected on economic feasibility grounds which appear to conflict with other aspects of the DEIR. The developer rejects alternatives which would increase the housing component of the project and reduce the office component as constituting 'economic underuses' of the site.

X. Summary of Comments and Responses

Yet the DEIR notes the high demand for housing and a 12.4% vacancy rate in office construction. (DEIR, 64). In fact, the Planning Department currently believes that the vacancy rate is close to 17% and is so high as to render new office construction unnecessary.

"We do not believe the EIR process provides a license for intensive analysis of the economic feasibility of a project -- but bold statements of economic infeasibility or 'underuse' cannot be accepted when they flatly contradict other statements in the DEIR and in the public domain. Given the economic considerations recited by the DEIR (and those which the DEIR should recite if it is to be found adequate) rejection of alternatives as representing economic underuse of this site is simply inadequate. More information is required before the public and the decision-makers can accept such a statement."
(Howard Ellman)

Responses

The EIR does not state that any alternative is rejected "for not offering a reasonable return on investment capital" because such a statement could not be verified by the Department of City Planning. Instead, the EIR states the sponsor's reasons for rejecting an alternative. The statement is clearly identified as the sponsor's judgement in each case.

Discussion of the economic feasibility of a project is not part of the environmental review process. The sponsor may state his reasons for rejecting any alternative. The decision makers are not bound by these reasons and may approve, with proper findings, whichever alternative they choose. As discussed on pp. 370 to 381, the project sponsor's preferred plan would include less office space than the proposed project and would include only housing and retail on A-Site.

Comment

"The DEIR is inadequate.[/1/] A Final EIR based on the DEIR will also be inadequate unless the project sponsor is able to provide a full and complete economic explanation for rejection of the low-rise and housing intensive alternatives. When the Planning Department is rejecting as 'unnecessary' and economically unjustifiable development of office space in the area targeted by the Downtown Plan as the prime office development

X. Summary of Comments and Responses

area, it is incumbent upon the Department to explain why vital policies of the Downtown Plan must be twisted or disregarded in their entirety to build a C-3-type office building outside of the C-3 District."

[/1/] In addition to the reasons they have set forth, Hill Dweller, Condominium Association and Crow intend to rely upon such comments and arguments as may be made by any other person participating in these proceedings if it becomes necessary to seek judicial review of certification of any EIR for the project or to challenge any project approval with which they disagree." (Howard Ellman)

Response

The Planning Commission when making their determination regarding the project may approve, approve with conditions, or disapprove the project, one of its alternatives or a combination of alternatives. The commentor does not specify which policies of the Downtown Plan he considers to be "vital" and "twisted or disregarded." As discussed on p. 78 of the EIR, "The project would not change the historic uses on the sites, but would affect the scale and character of the surrounding neighborhoods except for the Financial Districts" (emphasis added). All uses proposed within the project are principal permitted uses under the existing zoning.

Neither the Planning Department nor the Planning Commission have rejected any of the alternatives; the reasons for rejection of alternatives given in the EIR are those of the sponsor. The Planning Commission will determine whether to approve the project or one of its alternatives on the basis of information presented to them including all information contained in this report.

MISCELLANEOUS

Comment

"Failure To Discuss Impacts And Mitigation Measures With Respect To Existing Residential Development. As the DEIR notes (page 38), the project is proposed in an area of existing residential development including the condominiums within the Montgomery -

X. Summary of Comments and Responses

Washington Building. However, the DEIR does not discuss the noise, traffic, dirt and other impacts construction of the project is likely to have on the people who live in the area, or measures to mitigate those impacts, such as hours of operation, dust control and periodic window cleaning." (Howard Ellman)

Response

As stated on p. 38 of the EIR, the proposed project is in an area with office, retail and residential uses interspersed with each other; the EIR considers the project in this context. Project construction noise was focused out of the EIR in the Initial Study (see p. A-20); mitigation measures to reduce construction noise and construction air quality impacts are included in the Initial Study (see pp. A-33 to A-34). The project contractor would be required to muffle and shield intakes and exhaust and use electric-powered equipment and to construct barriers around the site and construction equipment to reduce noise levels. The contractors would also be required to sprinkle the site continuously during demolition, at least twice a day during construction and sweep the construction site once a day to control dust (TSP) emissions. Traffic impacts during construction are discussed in the EIR on page 102 to 103. Air Quality impacts due to construction are addressed in the EIR in the second paragraph on p. 133. A mitigation measure for construction generated traffic impacts is included as part of the project (see p. 152 of the EIR).

IV. STAFF-INITIATED TEXT CHANGES

The following new paragraphs are added after the first partial paragraph on p. 37 of the EIR:

On November 14, 1986, the voters of San Francisco passed Proposition M, the Accountable Planning Initiative. It amends Section 320(g)(1) of the City Planning Code to lower the threshold for office projects subject to the annual limit from 50,000 to 25,000 gsf of additional office space. Since the proposed project would add office space in excess of 25,000 gsf, it is now subject to the provisions of Sections 320 - 325 as amended by Proposition M. Proposition M also adds Section 321.1 to the Planning Code, and reduces the approval period from three years to one year; and changes the limitation amount from 2.85 million sq. ft. of office space over three years to 950,000 gsf in each one-year period. Section 321.1 requires the adjustment of the 950,000 square foot annual limit by limiting new office space approvals to 475,000 gsf annually until the total amount of space approved since November 29, 1984 is reduced to zero in annual increments of 475,000 square feet. Up to 950,000 gsf may be approved during the approval period ending October 1987 because no projects were approved under the Office Limitation Program during the first year period ending October 17, 1986.

Proposition M also establishes eight Priority Policies. These policies are: preservation and enhancement of neighborhood-serving retail uses; protection of neighborhood character; preservation and enhancement of affordable housing; discouragement of commuter automobiles; protection of industrial and service land uses from commercial office development and enhancement of resident employment business ownership; earthquake preparedness; landmark and historic building preservation; and protection of open space. Prior to issuing a permit for any project which requires an Initial Study under CEQA or adopting any zoning ordinance or development agreement, the City is required to find that the proposed project or legislation is consistent with the Priority Policies. The City Planning Commission, in its decision regarding the proposed project approval or disapproval would make a determination of the project's conformance with the Priority Policies.

The Draft EIR, on p. 131, describes carbon monoxide (CO) levels resulting from cumulative development in the greater downtown. It states that, of the intersections for which future CO concentrations were forecast, the intersection of Brannan and Sixth was expected to violate state and federal standards in 2000, and that additional intersections which were not analyzed might also violate standards. It further states, on pp. 132 to 133, that this analysis did not take into account the reduction in CO emissions expected as a result of the State-mandated Inspection and Maintenance (I/M) program, which went into effect in 1984.

X. Summary of Comments and Responses

Since the Draft EIR was published further analysis has been conducted, in cooperation with the Bay Area Air Quality Management District, of the future carbon monoxide impacts of greater downtown development. This analysis, which has been presented in all San Francisco EIRs since mid-1986, indicates that there will be no violations of state and federal CO standards in the year 2000. Therefore, the discussion of impacts on pp. 131 to 133 and the conclusion in Chapter VI of the Pan Magna Plaza Draft EIR are incorrect, and do not reflect the most current, publicly available, information.

Change the second, third and fourth sentences of the second full paragraph on p. 131 of the Draft EIR to read (changes are underlined):

The Downtown Plan EIR analysis found that CO concentrations at 10 of the 11 intersections would be within the state and federal eight-hour standards in 2000, while one intersection would continue to violate those standards. However, a reanalysis of this intersection using updated emission factors supplied by the Bay Area Air Quality Management District indicates that the violation would be eliminated as a result of the statewide Vehicle Inspection and Maintenance Program.

The last paragraph on p. 132 and the first paragraph on p. 133 of the Draft EIR are replaced with the following:

By taking future CO reductions into account, the current analysis predicts that none of the intersections which have been modeled within the greater downtown would violate CO standards in 2000.

The third and fourth sentences on p. 133 are deleted.

The second sentence of the last paragraph on p. 160 is changed to read:

These cumulative transportation impacts would cause violations to total suspended particulate (TSP) standards in San Francisco with concomitant health effects and reduced visibility.

The following text is added to the EIR following Alternative F, following p. 172 (with a summary on p. 14).

G. REDUCED OFFICE SPACE

Under this alternative the building on B-Site would be the same as with the proposed project (81,300 sq. ft of office, 9,500 sq. ft. of retail and 31 parking spaces). The building on A-Site would be 11-stories tall (northern portion) along Jackson Street

X. Summary of Comments and Responses

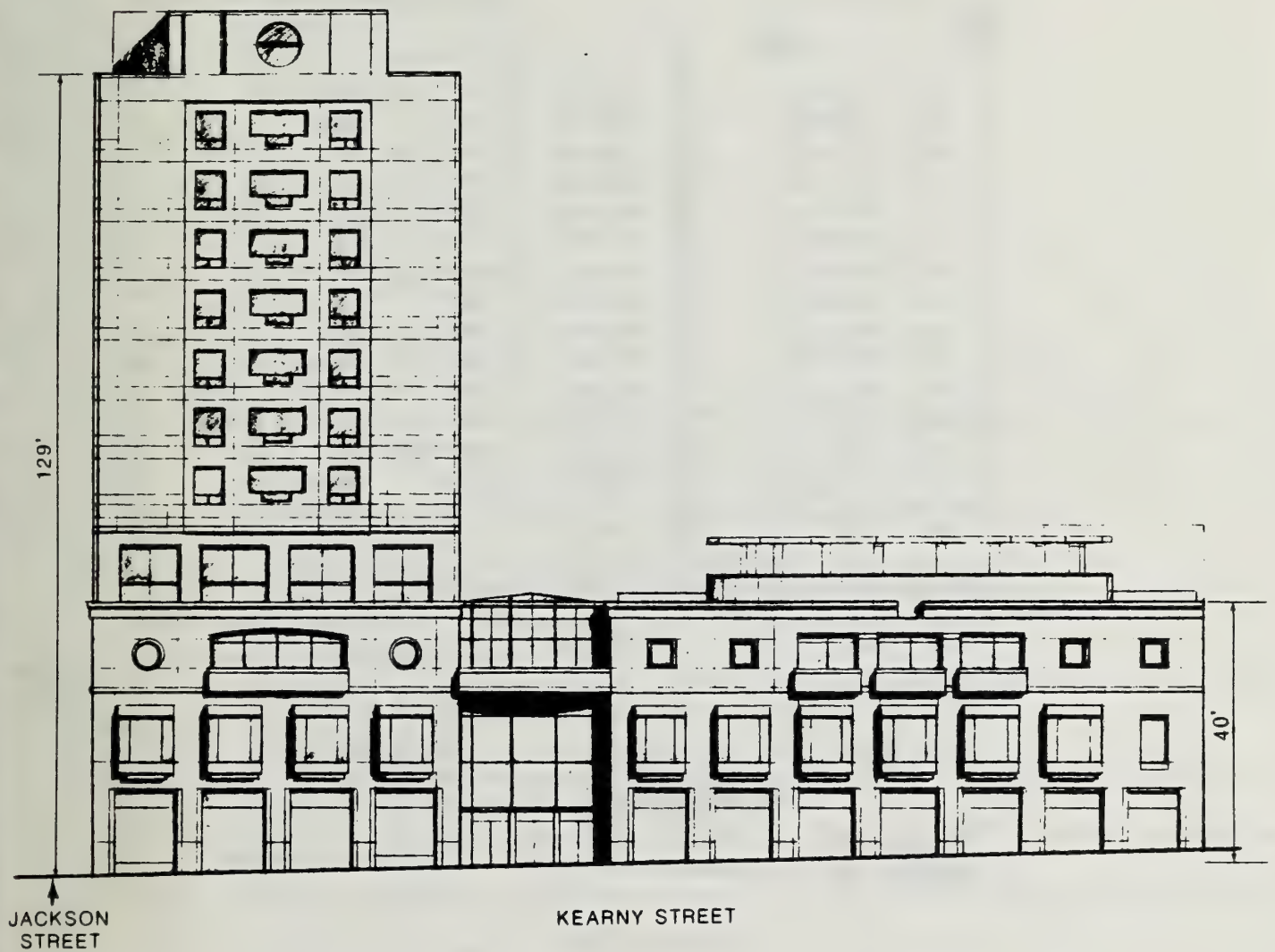
and would step down to three-stories tall (southern portion) south of Jackson Street along Kearny Street (see Figures 39, 40 and 41). The building would have three levels of basement parking accessible from Jackson Street. The first two floors of the structure would have retail space with restaurant space on the third floor (see Figure 42, Ground Floor Plan). About half of the first basement level would have restaurants accessible by escalator from the atrium courtyard (see Figure 43). The retail/restaurant levels would be common to both the northern and southern portions of the building. An atrium courtyard would be located in the center of the southern portion of the building with a rooftop garden and terrace atop of the third floor. The first basement levels would be accessible directly from Jackson Street. Escalators would connect the first three floors of the structure. Seven floors of residential units and a community services floor (fourth) would be located in the northern portion of the building.

Under this alternative, A-Site would include 126 residential units (51,900 sq. ft.), a total of 43,300 sq. ft. of commercial space (19,300 sq. ft. retail and 24,000 sq. ft. restaurant space) and 155 self-service parking spaces; as compared to 120 units, 96,800 sq. ft. of office 12,100 sq. ft. of retail and 108 valet parking spaces with the project. Residential space would include 35 double units at 325 sq. ft. each and 91 single units at 250-300 sq. ft. each. Alternative G would also include 6,600 sq. ft. of community space and one loading dock. The height of the residential or northern portion of the building would be about 130 ft. with a 10 ft.-tall mechanical penthouse atop; the southern portion would be about 45 ft.-tall not including the mechanical penthouse. Neither portion of the building would include setbacks.

The Chinatown Permanent Zoning Controls (approved by the Planning Commission in February 19, 1987) require 48 sq. ft. of open space per dwelling unit. The City Planning Code specifies that for dwelling units specifically designed for and occupied by senior citizens or physically handicapped persons the minimum amount of open space required is reduced to one-half the amount otherwise required. Under Chinatown Permanent Controls, this alternative would be required to provide about 4,022 sq. ft. of common usable of open space for residential uses. Commercial open space requirements are one sq. ft. for every 50 sq. ft. (gross floor area) of commercial space; Alternative G would be required to provide 2,682 sq. ft. of open space for commercial uses. Open space requirements would be met with the rooftop garden and, terrace (9,400 sq. ft.). The rooftop garden and terrace would also meet the projects site coverage requirement (Section 134.1, Permanent Controls) that new structures provide 25% of the site in non-covered area on residential levels; rooftop terraces and balconies are considered non-covered.

Alternative G would require the same approvals to those necessary for the project and listed on p. C&R 38, with the exception of the variance from Section 134.1 Site Coverage requirements.

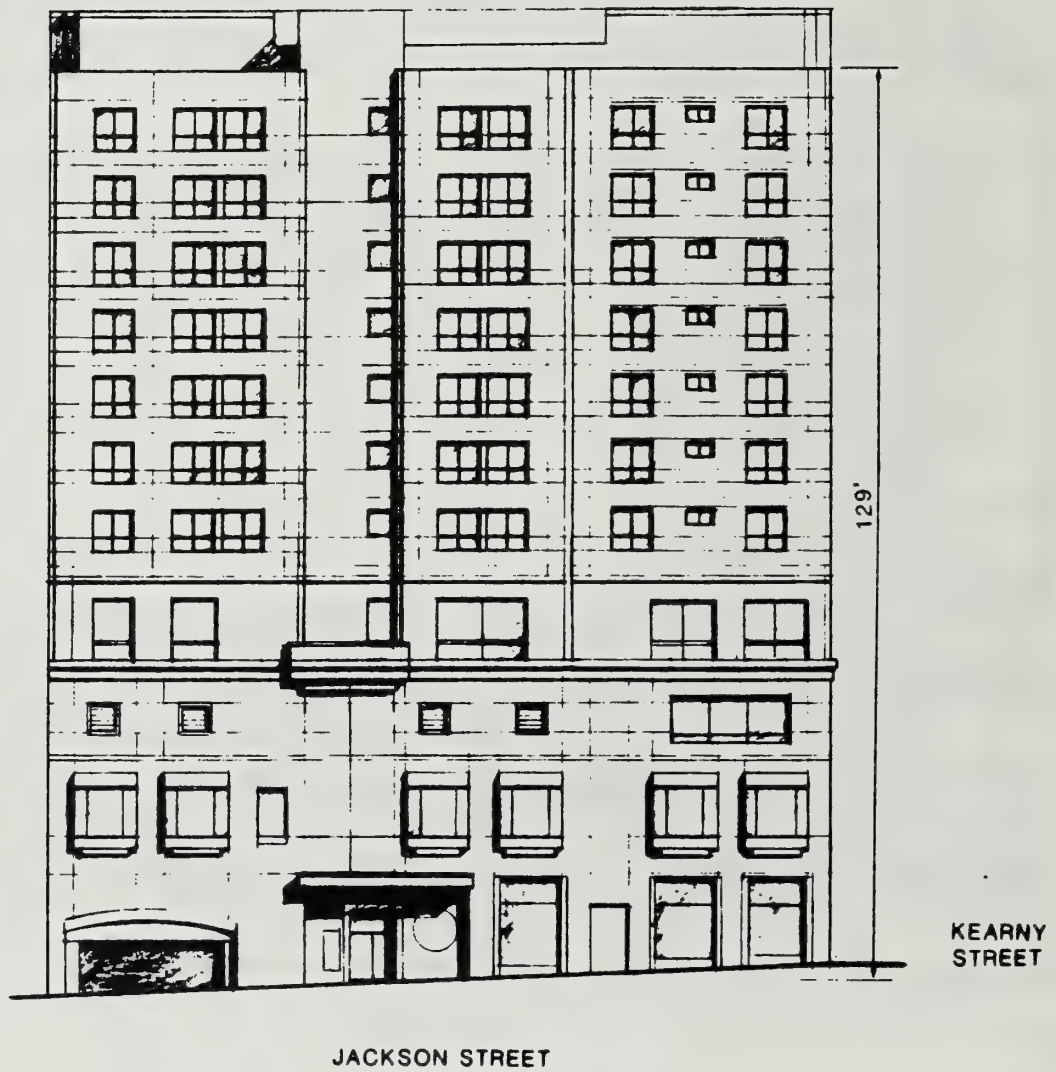
The impacts for B-Site of this alternative would be about the same as, or less than, those with the proposed project. The northern portion of the A-Site structure would be about 55 ft. taller than the proposed project at Jackson and Kearny Streets and about 150 ft. shorter at the southern portion along Kearny Street, not including mechanical penthouses. (Photomontages of Alternative G are shown in Figures 44 and 45.)



0 FEET 50

SOURCE: Lun Chan Associates

FIGURE 39
ALTERNATIVE G, A-SITE
KEARNY STREET ELEVATION



0 FEET 50

FIGURE 40
ALTERNATIVE G, A-SITE
JACKSON STREET ELEVATION

SOURCE: Lun Chan Associates

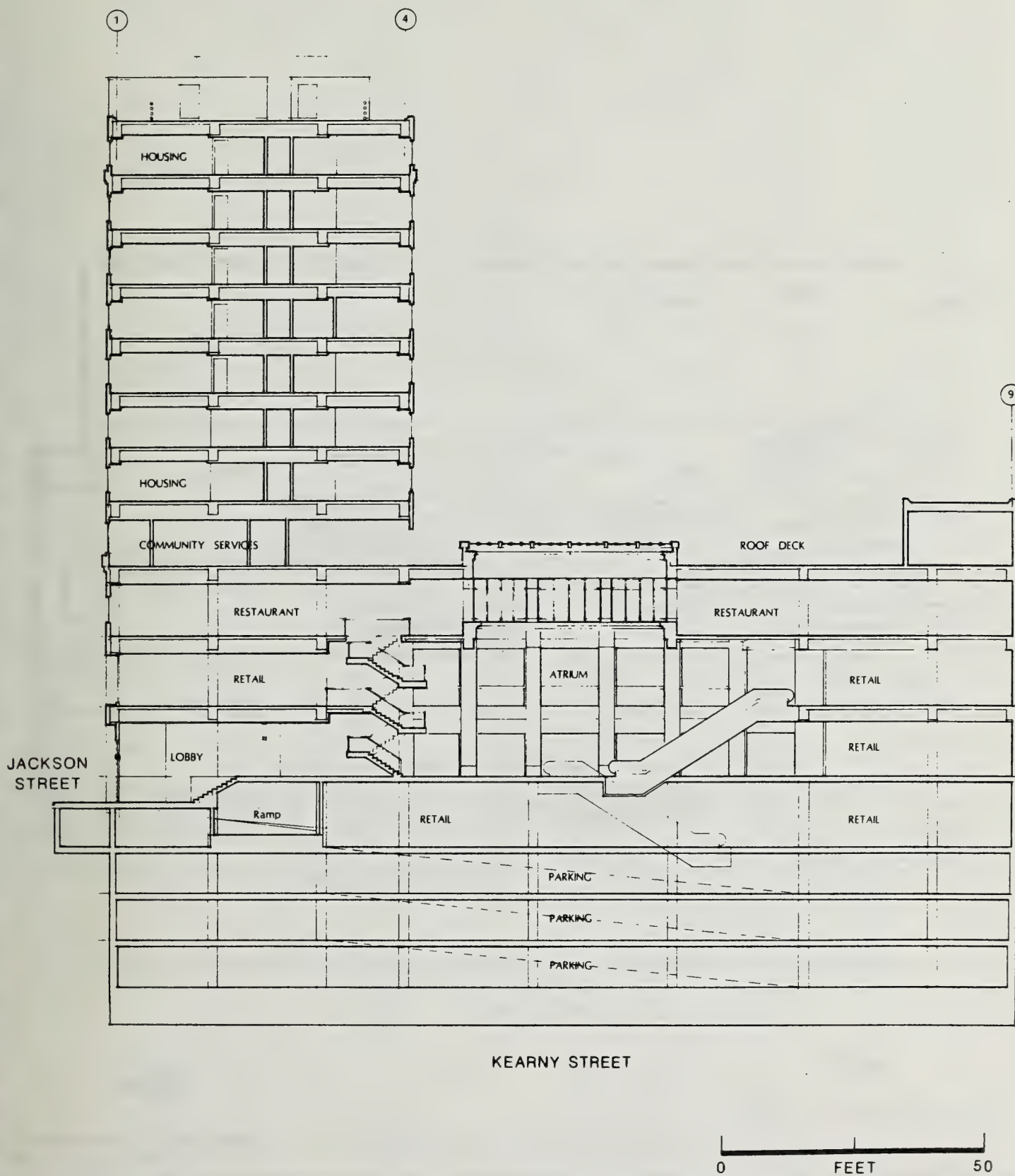


FIGURE 41
ALTERNATIVE G, A-SITE
BUILDING SECTION

SOURCE: Lun Chan Associates

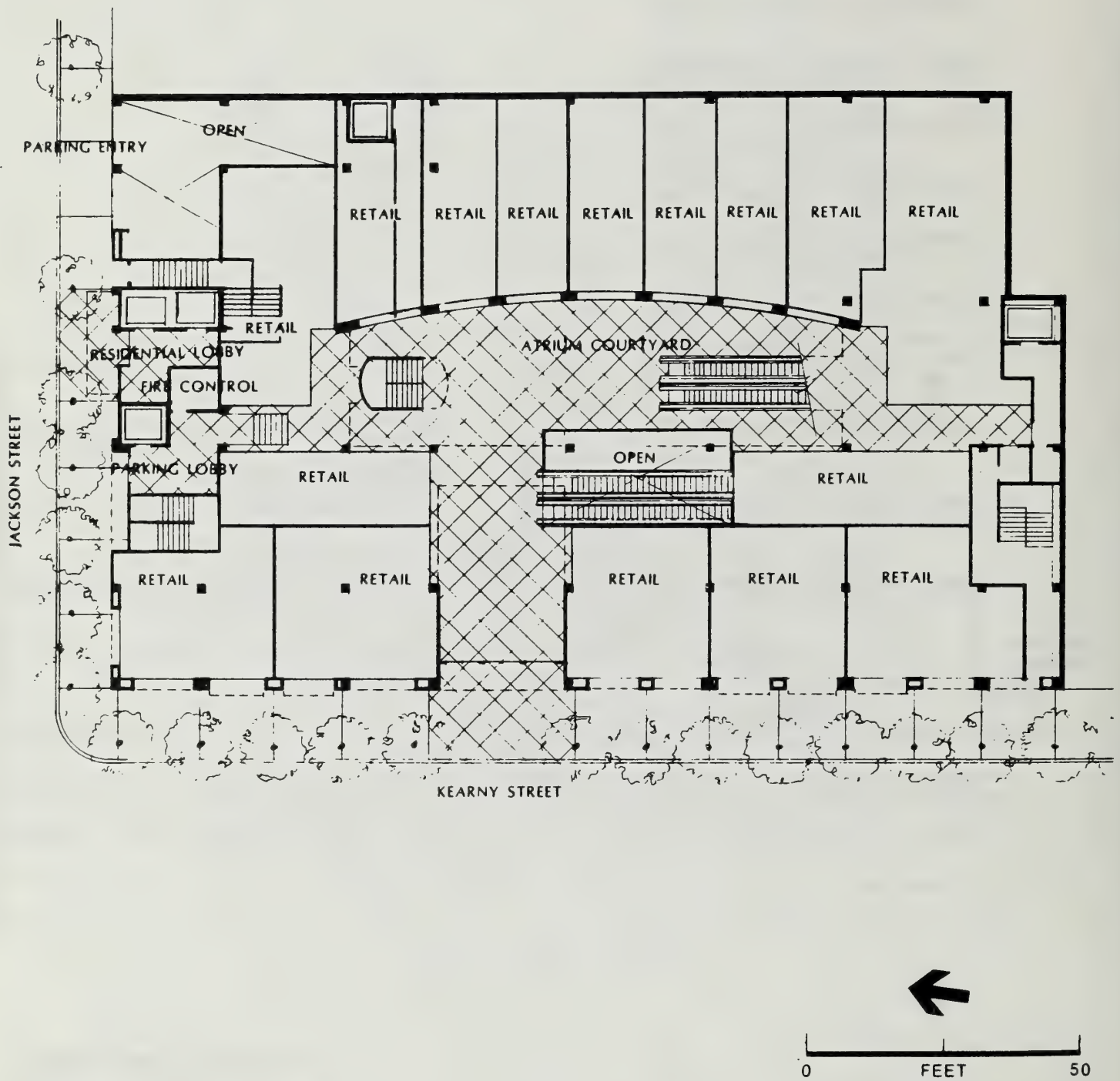


FIGURE 42
ALTERNATIVE G, A-SITE
GROUND FLOOR PLAN

SOURCE: Lun Chan Associates

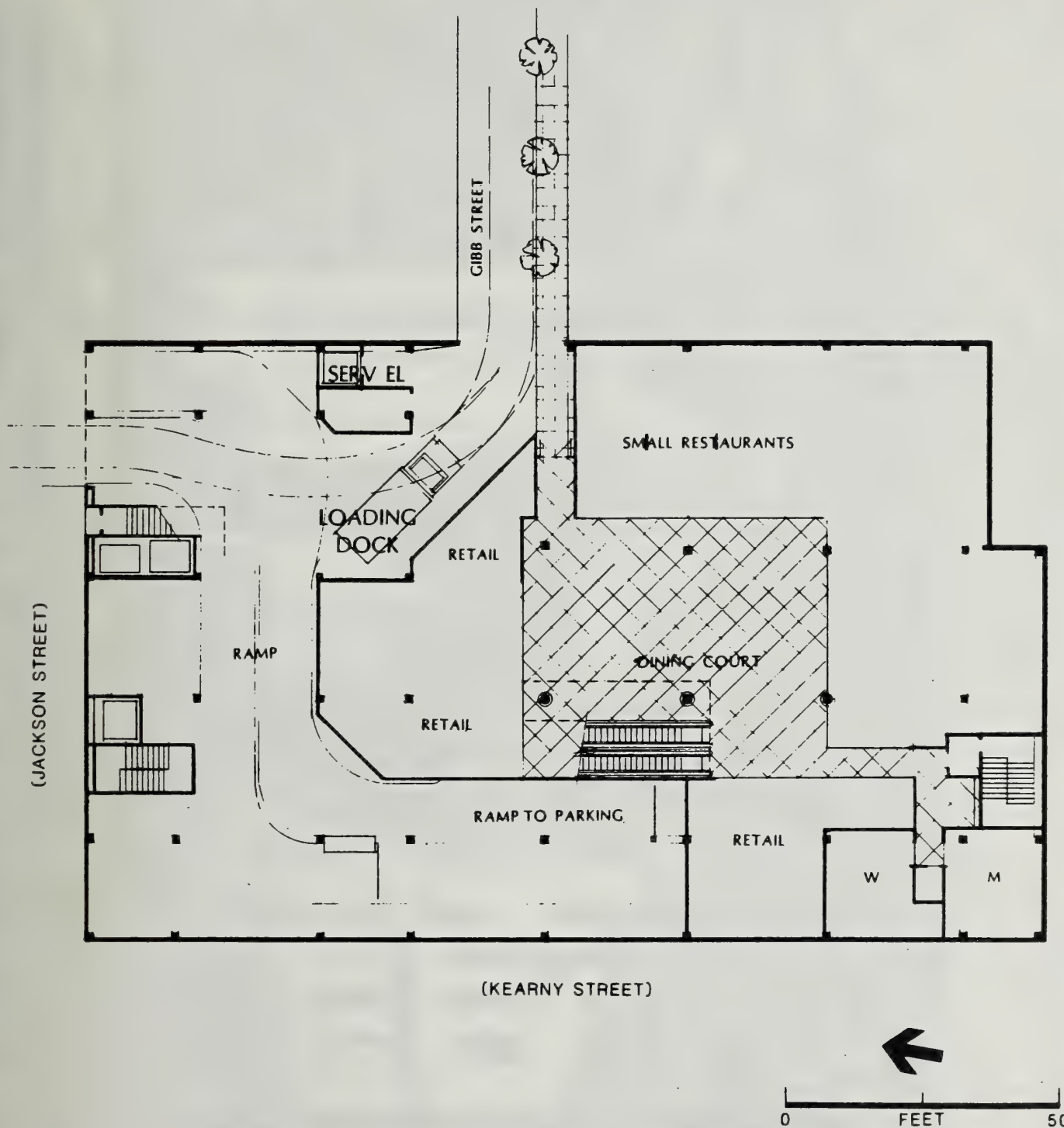


FIGURE 43
ALTERNATIVE G, A-SITE
FIRST BASEMENT LEVEL PLAN

SOURCE: Lun Chan Associates

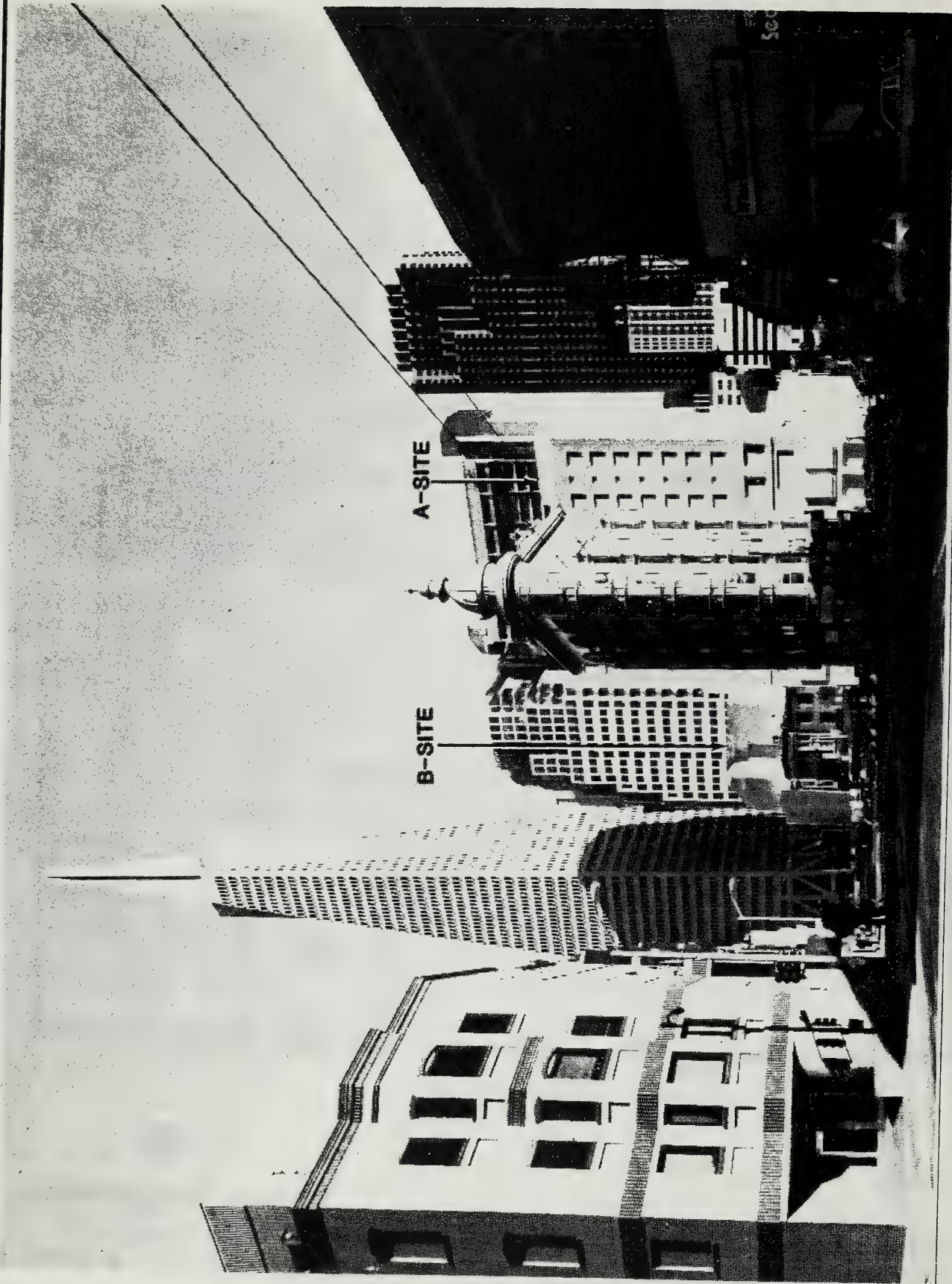


FIGURE 44
ALTERNATIVE G: PHOTOMONTAGE OF A- AND B-SITES
FROM COLUMBUS/KEARNY INTERSECTION

SOURCE: Douglas Symes

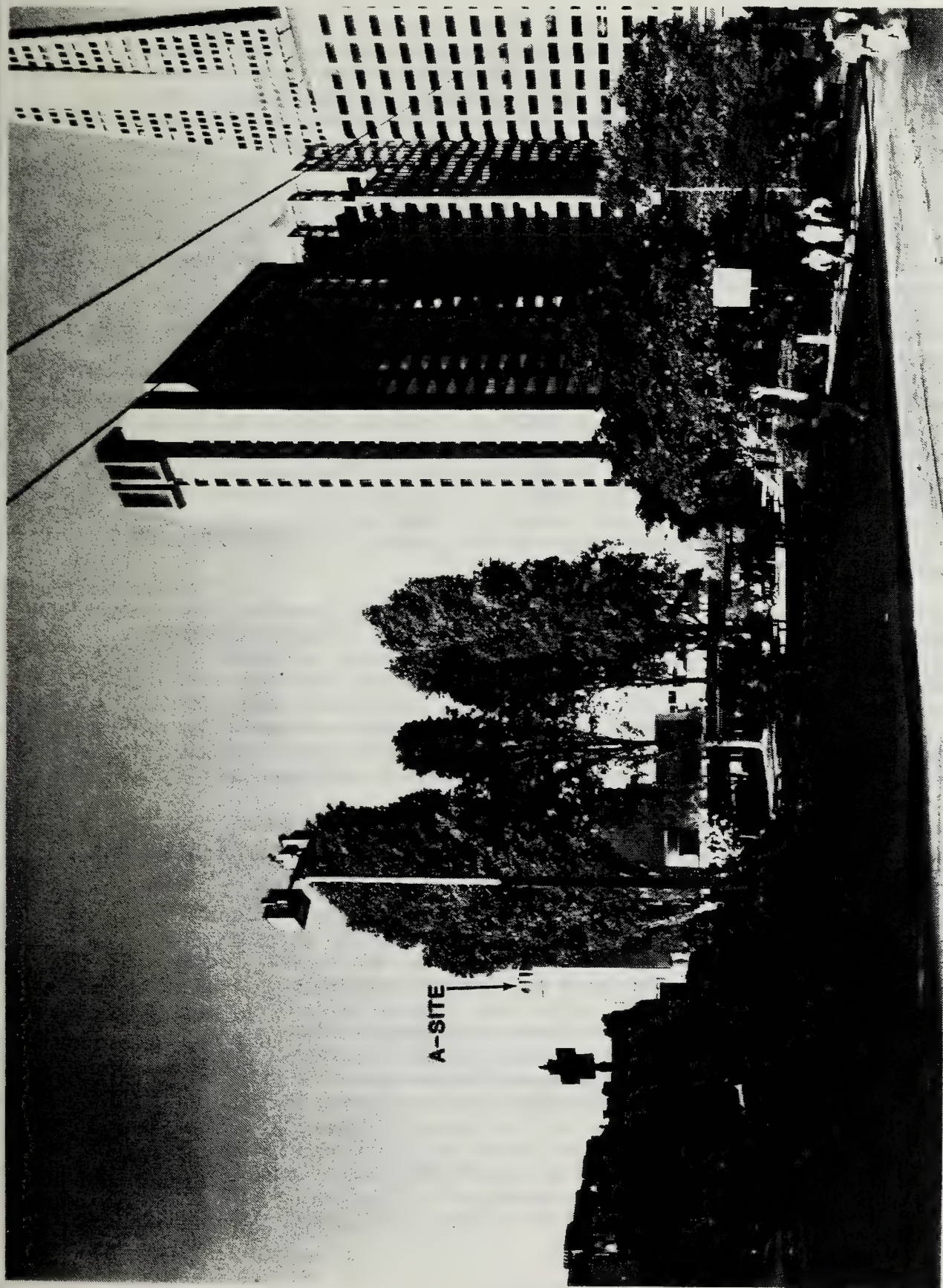


FIGURE 45
ALTERNATIVE G: PHOTOMONTAGE OF A-SITE
FROM SOUTHWEST CORNER OF PORTSMOUTH SQUARE

SOURCE: Douglas Symes

X. Summary of Comments and Responses

Neither the northern or southern portion of the structure on A-Site would include any setbacks; due to its overall reduced heights, it would be less prominent than the project in mid- and long-range views from the north and west. From Telegraph and Nob Hills, this alternative would be visible as would the proposed project. However, it would be less prominent. The southern portion of the building on A-Site under this alternative would be similar to the existing streetwall height along Kearny Street.

Shadow effects from B-Site would be the same as with the project. The configuration of shadows from A-Site would be different from the project because the taller portion of the structure would be at the corner of Kearny and Jackson Streets whereas for the project, the taller portion of the structure would be at the southern portion of the site. Generally shadows from A-Site under Alternative G would be shorter than with the project, because of the reduced overall height. Alternative G would result in incrementally more shadow on the street and sidewalk on Kearny between Jackson and Columbus, Columbus between Jackson and Kearny and Jackson for approximately one-half block from the site in both directions. It would result in less shadow on Kearny between Washington and Jackson, Columbus between Washington and Jackson and Gibb Street. Shadow diagrams for A-Site under Alternative G, at 10 a.m., noon, and 3 p.m. during March, June and September are on file and available for public review at the Office of Environmental Review, 450 McAllister, San Francisco. (Shadows from A-Site under this alternative in December would differ from project shadows but would not result in additional shadows on streets and sidewalks compared to the project. All additional shadow would fall on rooftops.)

Using the Downtown Plan EIR analysis this alternative would generate about 9,270 net new daily pte; about 44% more than with the project. This alternative would generate more trips than the project because of its increased amount of retail space. Using the Downtown Plan EIR analysis peak period pte with this alternative would be about 975 with 590 occurring during the peak hour, representing about 11% more than with the project. Impacts on traffic and transit would be proportionately more. With this alternative, using the Downtown Plan EIR analysis Levels of Service at the six intersections analyzed (see p. 121 of the EIR) would be the same as with the project.

Transportation impacts of Alternative G have been analyzed using modal split data from the Transportation Impact Analysis for the Proposed Chinatown Rezoning Plan (see pp. 69 to 72 of this document for a discussion of this analysis). Using the Chinatown analysis, Alternative G would generate 6,035 net new daily pte with 840 occurring during the peak period and 520 during the peak hour. Table 13A below shows peak period and peak hour trips by mode from Alternative G.

Using the Chinatown modal splits, daily trips would be less than one percent more than the numbers generated by the project using the same analysis, and peak hour trips would be about 16% and 24% less than with the project. Travel from Alternative G would be distributed more uniformly throughout the day than with the project because of the increased retail space. Impacts on traffic and transit would be proportionately less than the project analyzed with the Chinatown modal splits.

X. Summary of Comments and Responses

Levels of service at the six intersections analyzed have been analyzed here with Alternative G using the method used in the Transportation Impact Analysis for the Proposed Chinatown Rezoning Plan. Table 13B shows the effects of Alternative G. The levels of service at these intersections would be the same as with the project using this method.

TABLE 13A: PROJECTED TRAVEL DEMAND BY MODE FROM ALTERNATIVE G USING "CHINATOWN METHODOLOGY" (pte/a/)

<u>Travel Mode</u>	<u>P.M. Peak Period/b/</u>	<u>P.M. Peak Hour/b/</u>
Drive Alone	190	120
Car/Vanpool	175	100
Muni	270	165
BART	20	15
AC Transit	5	5
San Trans	10	5
SPRR (Caltrain)	5	5
GGT Bus	-	-
Ferry	-	-
Walk Only/c/	165	-
Other	-	105
TOTALS (rounded)	840	520

/a/ Person trip ends

/b/ The peak hour occurs during the two-hour peak period of 4:00 to 6:00 p.m.

/c/ These trips are solely walking trips and are not made in combination with any other form of transportation. Destinations are to other places than just home.

SOURCE: Environmental Science Associates

This alternative would create a net new demand for about 95 long term spaces and net new demand for 40 short term spaces for a total daily demand of 135 equivalent daily spaces. This alternative would provide 186 cars, a surplus of 51 spaces as compared to the deficit of 40 spaces that the project would create.

This alternative would generate a demand for an average of two loading spaces per hour with a peak hourly demand for 2.5 loading spaces. One loading space would be required on A-Site and none on B-Site as with the project. One loading dock would be provided on the ground floor of A-Site with access from Jackson Street. Trucks would circulate through the ground floor and exit on Gibb Alley and Columbus Avenue (see Figure 43). A right-turn only would be permitted at the truck exit from Gibb Alley to Columbus Avenue. Site B would generate a demand for one loading space per hour. As with the project, the sponsor would request a loading zone curb designation for Washington St. from the Department of Public Works.

X. Summary of Comments and Responses

Air quality, energy and noise effects associated with on-site uses would be about the same as with the project. Cultural resource effects associated with construction of this alternative could be greater than with the project as this alternative would include four basement levels on A-Site compared with two for the project.

Alternative G is the project sponsor's preferred alternative as it would meet his objectives for the site and respond to concerns raised about the project.

TABLE 13B: PROJECTED PEAK-HOUR INTERSECTION VOLUME-TO-CAPACITY RATIOS (V/C) AND LEVELS OF SERVICE (LOS) FOR ALTERNATIVE G USING "CHINATOWN METHODOLOGY" /a/

<u>Intersection</u>	<u>Existing</u>		<u>Existing+Alternative G</u>	
	<u>V/C</u>	<u>LOS</u>	<u>V/C</u>	<u>LOS</u>
Columbus & Montgomery	0.75	C	0.76	C
Columbus & Jackson	0.67	B	0.71	C
Kearny & Jackson	0.62	B	0.63	B
Broadway & Sansome	-	C	0.81	D/b/
Clay & Battery	-	C	0.75	C/b/
Kearny & Washington	0.46	A	0.50	A

/a/ Level of Service descriptions and relationship to V/C ratios are shown in Table D-3, p. A-53 of Appendix D.

/b/ These intersections are analyzed with the Chinatown Modal Splits but not with the Chinatown LOS Method.

SOURCE: Environmental Science Associates, Inc., Transportation Impact Analysis for the Proposed Chinatown Rezoning Plan

X. Summary of Comments and Responses

ADDENDUM

Draft Summary of Comments and Responses Pan Magna Plaza 84.533EC May 29, 1987

The following text should be added to Staff-Initiated Text Changes, p. 381 of the Draft Summary of Comments and Response document:

The Draft EIR, on p. 131, describes carbon monoxide (CO) levels resulting from cumulative development in the greater downtown. It states that, of the intersections for which future CO concentrations were forecast, the intersection of Brannan and Sixth was expected to violate state and federal standards in 2000, and that additional intersections which were not analyzed might also violate standards. It further states, on pp. 132 to 133, that this analysis did not take into account the reduction in CO emissions expected as a result of the State-mandated Inspection and Maintenance (I/M) program, which went into effect in 1984.

Since the Draft EIR was published further analysis has been conducted, in cooperation with the Bay Area Air Quality Management District, of the future carbon monoxide impacts of greater downtown development. This analysis, which has been presented in all San Francisco EIRs since mid-1986, indicates that there will be no violations of state and federal CO standards in the year 2000. Therefore, the discussion of impacts on pp. 131 to 133 and the conclusion in Chapter VI of the Pan Magna Plaza Draft EIR are incorrect, and do not reflect the most current, publicly available, information.

Change the second, third and fourth sentences of the second full paragraph on p. 131 of the Draft EIR to read (changes are underlined):

The Downtown Plan EIR analysis found that CO concentrations at 10 of the 11 intersections would be within the state and federal eight-hour standards in 2000, while one intersection would continue to violate those standards. However, a reanalysis of this intersection using updated emission factors supplied by the Bay Area Air Quality Management District indicates that the violation would be eliminated as a result of the statewide Vehicle Inspection and Maintenance Program.

The last paragraph on p. 132 and the first paragraph on p. 133 of the Draft EIR are replaced with the following:

By taking future CO reductions into account, the current analysis predicts that none of the intersections which have been modeled within the greater downtown would violate CO standards in 2000.

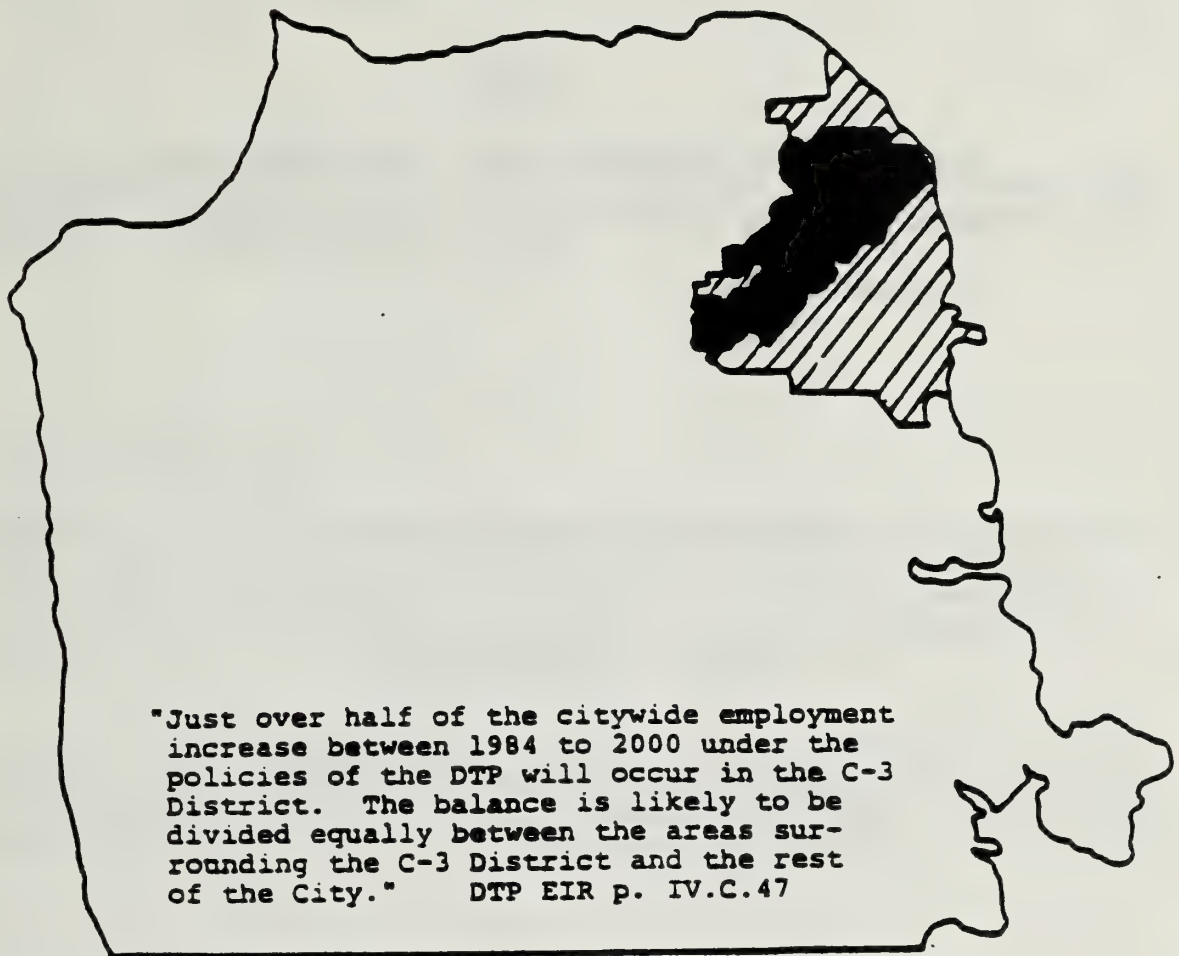
The third and fourth sentences of the fourth paragraph on p. 133 are deleted.

The second sentence of the last paragraph on p. 160 is changed to read:

These cumulative transportation impacts would cause violations to total suspended particulate (TSP) standards in San Francisco with concomitant health effects and reduced visibility.

ATTACHMENT I: MATERIAL SUBMITTED BY SFRG AS BACKGROUND TO COMMENTS

SP-1



GEOGRAPHIC AREA



C-3 AREA OF DOWNTOWN S.F.: THE AREA WHERE MOST OFFICE SPACE PRESENTLY EXISTS AND WHERE FUTURE OFFICE SPACE IS PLANNED.
91,260 ADDITIONAL WORKERS BY 2000.



NON-C-3 AREA OF DOWNTOWN SF: THE AREA WHERE MAJOR OFFICE SPACE IS PLANNED FOR FUTURE AND WHICH USES THE SAME TRANSPORTATION/TRANSIT NETWORK AS THE C-3 OF DOWNTOWN. 45,630 ADDITIONAL WORKERS BY 2000.



REMAINING NON-C-3 AREA OF SF: NOT PART OF DOWNTOWN OFFICE DISTRICT. THIS AREA WILL HAVE 45,630 ADDITIONAL WORKERS BY 2000.

SP-1

DOCUMENTATION SUBSTANTIATING THAT THE DTP EIR DISCUSSION OF FUTURE CITYWIDE EMPLOYMENT DIVIDES THE CITY INTO THREE AREAS AND THAT APPROXIMATELY 50% OF THIS EMPLOYMENT INCREASE WILL BE IN THE C-3 AREA OF DOWNTOWN; 25% IN THE NON-C-3 AREA OF DOWNTOWN; AND 25% IN THE REST OF THE CITY.

DOCUMENTATION SUBSTANTIATING THAT THERE WERE 280,860 C-3 WORKERS IN 1984 AND THAT THERE WILL BE 91,250 ADDITIONAL C-3 WORKERS BETWEEN 1984 AND 2000.

C-3 DISTRICT WORKERS IN 1984	280,860*
C-3 DISTRICT WORKERS IN 2000	372,1208*
INCREASE IN C-3 DISTRICT WORKERS FROM 1984 TO 2000	91,260

*From DTP EIR Table IV.C.15 (p.IV.C.41)

SP-2

SP-3

DOCUMENTATION SUBSTANTIATING THAT THE DOWNTOWN PLAN EIR SHOWS ABOUT 70% OF THE C-3 WORKERS TRAVEL OUTBOUND FROM THE C-3 DISTRICT DURING THE 2 HOUR P.M. PEAK PERIOD COMMUTE.

The DTP EIR states that:

"The C-3 District employee survey was necessary to establish the time and mode of travel of san francisco c-3 district employees, of whom about 70% travel to and from work during morning and evening peak periods of travel" (apppendix j, page j.6)

SP-4 on the next page is an annotated version of table iv.e.1 from the DTP EIR. This table confirms that approximately 70% (68.4% in 1984 and 68.9% in 2000) of the C-3 workers will commute during the P.M. Peak Period.

TABLE IV.E.1: C-3 DISTRICT TOTAL AVERAGE P.M. PEAK-HOUR AND PEAK-PERIOD PERSON TRIP-ENDS BY MODE, 1981/82, 1984, 1990 AND 2000 UNDER THE DOWNTOWN PLAN (a)

Primary Mode of Travel	1984 pte (b)		2000 pte (b)	
	Work		Work	
P.M. Peak Hour				
Drive Alone	22,980	72,460 PTE on Transit (57.9%)	24,580	100,720 PTE on Transit (60.5%)
Carpool (c)	21,300		29,100	
Vanpool	2,530		3,620	
Muni	29,510		36,540	
BART	22,320		36,120	
A.C. Transit	8,860		9,250	
SamTrans	1,900		3,050	
Charter/Club Bus	1,020		1,490	
CalTrain (SPRR)	2,720		4,360	
GGT Bus	5,170		8,180	
GGT Ferry	780	44.6% of the 280,860 Downtown workers commute during P.M. Peak Hour	1,450	44.7% of the 372,860 Downtown workers commute during P.M. Peak Hour
Tiburon Ferry	180		260	
Jitney	450		580	
Motorcycle	330		410	
Bicycle	90		100	
Walk (d)	5,280		6,900	
Taxi	430		560	
TOTALS	125,150		166,550	
P.M. Peak Period				
Drive Alone	32,820	114,690 PTE on Transit (59.6%)	37,840	159,950 PTE on Transit (62.4%)
Carpool (c)	28,430		37,040	
Vanpool	3,360		4,610	
Muni	34,700		67,230	
BART	32,050		52,930	
AC	11,990		14,890	
SamTrans	2,900		4,530	
Charter/Club Bus	1,000		1,320	
CalTrain (SPRR)	3,700		5,300	
GGT Bus	7,340		11,870	
GGT Ferry	1,010	68.9% of the 372,860 Downtown workers commute during P.M. Peak Period	1,680	68.9% of the 372,860 Downtown workers commute during P.M. Peak Period
Tiburon Ferry	300		450	
Jitney	780		990	
Motorcycle	740		920	
Bicycle	130		150	
Walk (d)	10,070		13,540	
Taxi	860		1,040	
TOTALS	192,180		256,330	

(a) The values in this table for employee travel in 1990 and 2000 are calculated on the basis of the Downtown Plan's Goals regarding increased car-sharing and transit use not being met. If the Plan's Goals are achieved, the Drive Alone travel values for work trips would decrease from the above and the Carpool, Vanpool and transit values would increase.

(b) Total person trip-ends (pte) to destinations or from origins in the C-3 District.

(c) Carpools are vehicles with up to three persons including the driver.

(d) Exclusive pedestrian travel; does not include other pedestrian travel made in conjunction with travel on other modes (i.e., walking to a bus stop). (See text for discussion.)

SOURCE: TJM Transportation Consultants

SP-4

ANNOTATED VERSION OF DTP EIR TABLE IV.E.1 CONFIRMING STATEMENTS IN THE DTP EIR THAT APPROXIMATELY 70% OF C-3 WORKERS COMMUTE DURING THE P.M.

DOCUMENTATION SUBSTANTIATING THAT APPROXIMATELY 62.4% OF C-3 WORKERS WILL USE TRANSIT AS THEIR MODE OF TRANSPORTATION IN 2000.

The DTP EIR states that:

"The transit agencies serving the C-3 district carry approximately 60% of the p.m. peak period employee work travel as well as about 20% of the p.m. peak period other travel."
(p.IV.E.7)

In addition, DTP EIR Table J.5 entitled "C-3 Modal Split; Percentage of Commute by Primary Travel Mode" shows that:

59.8% of the P.M. Peak Period commute travel in 1984 will be on transit.

62.6% of the P.M. Peak Period commute travel in 2000 will be on transit.

In addition, the annotated version of DTP EIR Table IV.E.1 or SP-4 shows that 59.6% of the P.M. Peak Period commute travel in 1984 was on transit and that 62.4% of the P.M. Peak Period commute travel in 2000 will be on transit.

DOCUMENTATION THAT THE DOWNTOWN PLAN EIR TABLES J.3, J.4, IV.E.1 AND 201 SPEAR STREET SEIR TABLE 2 HAVE IDENTICAL INFORMATION.

The comparison of the information contained in the four above Department of City Planning Tables indicating 1984 to 2000 increase in Person Trips Ends (PTE) for the C-3 district.

<u>TABLE NUMBER AND TITLE</u>	<u>ADDITIONAL P.M. PEAK HOUR PTES FROM 1984 - 2000 SHOWN IN TABLE</u>		<u>ADDITIONAL P.M. PEAK PERIOD PTES FROM 1984 - 2000 SHOWN IN TABLE</u>	
	<u>work</u>	<u>non-work</u>	<u>work</u>	<u>non-work</u>
DTP EIR TABLE J.3* "Peak Hour and Peak Period C-3 District Travel by Business Activity Group"	41,400	12,270	64,240	25,270
DTP EIR* TABLE J.4 "P.M. Peak Period C-3 Travel Distribution	peak hour not shown		64,150	25,150
DTP EIR* TABLE IV.E.1 "C-3 District Total Average P.M. Peak Hour and Peak Period Person-Trip-Ends by Mode	41,400	12,250	64,150	25,150
201 Spear SEIR Table 2 "Comparison of List Method and Economic Forecast Method Outbound P.M. Peak Hour Cumulative Travel Demand From C-3 Growth	41,400	12,100	peak period not shown	

*Tables indicate that slight differences are due to rounding.

SP-6

DOCUMENTATION SUBSTANTIATING THAT DOWNTOWN PLAN EIR TABLES J.3, J.4 IV.E.1 AND SEIR TABLE 2 CONTAIN ONLY C-3 TRANSIT DEMAND AND CONTAIN NO NON-C-3 COMPONENT.

The Department stated in a brief to the Board of Permit Appeals dated February 28, 1985, that:

"Table J.3 is entitled 'P.M. Peak-Hour C-3 district travel by business activity group...'. This table simply does not represent person trip ends outside the C-3 district." (p.26)

The Department stated on November 14, 1985 at the 201 Spear Street SEIR permit application hearing that:

"Table J.3 is in fact simply travel from the C-3 district. It doesn't purport to be anything else,...you cannot use table J.3 to reflect anything but travel from the C-3 as it is labeled." (p.30 -31 of 201 spear transcript)

DOCUMENTATION SUBSTANTIATING THAT EACH C-3 WORKER WHO CROSSES THE C-3 BOUNDARY AREA ON TRANSIT HAS ONE INBOUND PERSON TRIP END (PTE) IN THE MORNING COMING TO THE C-3 AREA AND ONE OUTBOUND PTE IN THE EVENING DEPARTING THE C-3 AREA.

Trip generation assumptions in the DTP EIR are discussed in Appendix J, pages J.3 through J.9. This appendix logically presumes that each C-3 worker generates two one-way person-trip-ends for work, one in the morning and one in the evening. The downtown plan eir states that:

"Each employee has two one-way person-trip-ends for work" (p.j.6); and,

"Employee travel in the P.M. Peak has been generated using employee departures as a base." (p. j.9)

Thus, it is presumed that C-3 employees generate outbound ptes.

DOCUMENTATION SUBSTANTIATING THAT DOWNTOWN PLAN EIR TABEL IV.E.2 AND 201 SPEAR STREET SEIR TABLE 3 SUMMARIZE IDENTICAL INFORMATION, SHOW OUTBOUND RIDER DEMAND ONLY, AND INCLUDE TRANSIT DEMAND FROM ALL SOURCES.

DTP EIR Table IV.E.2 is entitled "Outbound P.M. Peak-Hour and Peak-Period Transit Riderships, Passenger per Seat Ratios (p/s), and Levels of Service (los) at Regional and C-3 Screenline...". Footnote (d) for this table states "demand includes both C-3 district riders and riders from outside the C-3 district."

SEIR Table 3 is entitled "Outbound Regional Transit Demand and Level of Service" and columns containing DTP eEIR information are identical to the columns in DTP EIR Table IV.E.2.

DOCUMENTATION SUBSTANTIATING THAT DOWNTOWN PLAN EIR TABLE IV.E.2 AND 201 SPEAR STREET SEIR TABLE 3 SHOW OUTBOUND TRANSIT DEMAND DURING THE P.M. PEAK PERIOD DOWNTOWN CANNOT INDICATE WHETHER THE TRIPS ARE FROM C-3 OR NON-C-3 ORIGINS.

In the responses to comments for the 201 spear seir, the department states that:

"Because of the inherent complexity of the transportation modelling process, it was not possible to separately identify the non-C-3 travel component for several of the transit carriers. Therefore, the portion of travel labeled 'C-3 travel' in many cases also includes some non-C-3 travellers. As explained in Appendix J to the DTP EIR, in some cases it was not possible to separate C-3 and non-C-3 travellers reflected on the totals. (see pp. j.20 - 25)" (p.98)

In addition, the Department states in the Responses to Comments for the Hills Plaza Eir that:

"It becomes clear that while total travel on various transportation systems is accurately projected by the computer model [in the DTP EIR], the portion of the total that represents non-C-3 travellers cannot be identified in such a way as to permit comparison with any estimates of numbers of workers expected to have jobs in the non-C-3 portions of the greater downtown." (p.106, Hills Plaza Responses to Comments EE #84.41)

DOCUMENTATION SUBSTANTIATING THAT THE TRAVEL CHARACTERISTICS FOR THE DOWNTOWN SAN FRANCISCO NON-C-3 AREA EMPLOYEES WHICH ARE IN CLOSE PROXIMITY TO THE C-3 AREA ARE APPROXIMATELY THE SAME AS FOR THE C-3 WORKERS

The workers from the non-C-3 area of downtown San Francisco utilize the same transportation and transit systems in the same time frame as do the C-3 workers. DTP EIR Figure IV.E.1 shows most of the downtown non-C-3 area is within the transit screenlines established as part of the DTP EIR transit methodology.

The Department has recently certified the EIR for the Hills Plaza project and has issued an SEIR for the Second and Folsom project. Both of these projects are in the non-C-3 area. However, they both presume the travel demand from the projects and the travel characteristics (i.e. percentage on transit to the East Bay, etc.) will be identical to C-3 projects. These EIRs state:

"The Second and Folsom project is outside the C-3 District. However, travel behavior of Second and Folsom project in the future has been assumed to be similar to travel in the C-3 District because of the close proximity of the Second and Folsom site to existing and proposed boundaries of the C-3 district as a result of proposed transit improvements for the South of Market area, and because the commercial land uses proposed for Second and Folsom are similar to C-3 District land uses. (p.42 2nd & Folsom SEIR EE #81.18; the same quotation appears on p. 101 Hills Plaza DEIR EE #84.41)

Many downtown non-C-3 buildings are closer to BART, the MUNI Metro, SamTrans, A.C. Transit, and Caltrain than most C-3 buildings. In addition, Appendix J of the Downtown Plan EIR states:

"For vehicular traffic, peak hour non-C-3 travel for future years was increased based on historical growth trends for each roadway. For the Golden Gate and Bay Bridges, no growth in non-C-3 vehicle trips was assumed." (DTP EIR p. J.22)

Also, Table IV.E.3 from the Downtown Plan EIR shows that US-101 and I-280 will be over capacity and that increase transit usage and car pooling is expected to increase. Therefore, the non-C-3 area of Downtown can be expected to have the same transit ridership characteristics as the C-3 area because of its close proximity and because of lack of viable alternatives.

SP-12

Peak Period:	1984		2000		Increase From 1984-2000		1984-2000 Outbound Increase	1984-2000 Inbound Increase
	work	other	work	other	work	other		
MUNI	54,700	9,870	67,230	12,400	12,530	2,530	13,795	1,265
BART	32,050	5,910	52,930	7,660	20,880	1,750	21,755	875
AC TRANSIT	11,990	-	14,890	-	2,900	-	2,900	-
SAMTRANS	2,900	-	4,530	-	1,630	-	1,630	-
CALTRAIN	3,700	1,490	5,300	1,860	1,600	370	1,785	185
G.G. BUS	7,340	590	11,870	740	4,530	150	4,685	75
G.G. FERRY	1,010	-	1,680	-	670	-	670	-
TIB. FERRY	300	-	450	-	150	-	150	-
					44,890	4,800	47,370	2,400
Peak Hour:								
MUNI	29,510	4,840	36,540	6,440	7,000	1,500	7,750	750
BART	22,320	2,850	36,120	3,890	13,800	1,040	14,320	520
AC TRANSIT	8,860	-	9,250	-	390	-	390	-
SAMTRANS	1,900	-	3,050	-	1,150	-	1,150	-
CALTRAIN	2,720	730	4,366	1,010	1,640	280	1,780	140
G.G. BUS	5,170	330	8,180	590	3,010	260	3,140	130
G.G. FERRY	780	-	1,450	-	670	-	670	-
TIB. FERRY	180	-	260	-	80	-	80	-
					27,740	3,080	23,890	1,540

SP-12

C-3 DISTRICT P.M. PEAK HOUR AND PEAK PERIOD PERSON-TRIP-ENDS ON TRANSIT FOR 1984, 2000 and INCREASES FROM 1984 TO 2000. THIS TABLE DOCUMENTS THAT OUTBOUND PTE ACCOUNT FOR 95% OF TOTAL PTE.

Source: DTP FIR Table IV.E.1 on page IV.E.25

TRANSIT SYSTEM	DTP EIR TABLE IV.E.1 MEASURING POINT AT C-3 BOUNDARY	DTP EIR TABLE IV.E.2 MEASURING POINT AT TRANSIT SCREENLINE	CONCLUSION
BART EASTBAY	Embarcadero	Embarcadero Station	<ul style="list-style-type: none"> o C-3 Boundary and Transit Screenline are virtually identical o No C-3 Riders can get off transit system between C-3 boundary and transit screenline o Comparing Table IV.E.1 and IV.E.2 information is legitimate
BART WESTBAY	Civic Center	Civic Center	<ul style="list-style-type: none"> o Same as BART EASTBAY
GOLDEN GATE & TIBURON FERRIES	Embarcadero	Ferry Building on Embarcadero	<ul style="list-style-type: none"> o Same as BART EASTBAY and WESTBAY
AC TRANSIT	Folsom Street	Bay Bridge	<ul style="list-style-type: none"> o C-3 Boundary and Transit Screenline are virtually identical o No C-3 Riders can get off transit system between AC Terminal and transit screenline o Comparing Table IV.E.1 and IV.E.2 information is legitimate
MUNI SOUTHWEST	12th St. South of Market; Franklin St. North of Market.	2 Blocks West of C-3 Boundary	<ul style="list-style-type: none"> o C-3 Boundary and Transit Screenline are virtually identical o Almost no riders expected to get off MUNI between C-3 Boundary and Transit Screenline (Most are physically unable to do so because they are in the MUNI Metro.) o Comparing Table IV.E.1 and IV.E.2 information is legitimate

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TRANSIT SYSTEM	DTP EIR TABLE IV.E.1 MEASURING POINT AT C-3 BOUNDARY	DTP EIR TABLE IV.E.2 MEASURING POINT AT TRANSIT SCREENLINE	CONCLUSION
CALTRAIN	Folsom Street	Townsend Street Station	<ul style="list-style-type: none"> o Meaningless Beyond the C-3 Boundary o However, no C-3 riders can get off "between" C-3 Boundary and screenline, since all riders leave from one location -- the Townsend Street station
MUNI SOUTHEAST NORTHEAST NORTHWEST	C-3 Boundary	Transit Screenlines	<ul style="list-style-type: none"> o There is significant non-C-3 area between the C-3 boundary and the regional screenline o Many non-C-3 riders could get of MUNI between the C-3 boundary and the regional screenline o It is inappropriate to compare Tables IV.E.1 and IV.E.2

COMPARISON OF DIFFERENCES IN THE C-3 BOUNDARY USED TO MEASURE C-3 DISTRICT TRAVEL DEMAND IN TABLE IV.E.1 of THE DTP EIR (TABLE 2 in 201 SPEAR ST. SEIR) and THE TRANSIT SCREENLINES USED TO MEASURE C-3 and NON-C-3 RIDERSHIP IN TABLE IV.E.2 OF THE DTP EIR (TABLE 3 in 201 SPEAR ST. SEIR)

SP-14

INCREASE FROM 1984-2000
IN OUTBOUND TRANSIT
CUMULATIVE TRANSIT
FROM C-3 DISTRICT
ONLY (SP-12,
DTP EIR TABLE IV.E.1, 1.
SEIR TABLE 2)

INCREASE FROM 1984-2000
IN OUTBOUND TRANSIT
RIDERSHIP DEMAND
FROM C-3 and NON-C-3
DISTRICT (DTP EIR TABLE
IV.E.2, SEIR TABLE 3) 1.

INCREASE FROM 1984-2000
IN OUTBOUND TRANSIT RIDERSHIP
IN THE NON-C-3 AREA FOR
SAN FRANCISCO

Peak Hour

BART (Transbay and Westbay)	14,320	14,200	-120
GOLDEN GATE FERRY	670	700	30
AC TRANSIT	390	1,400	1,100
CALTRAIN	1,780	1,800	20
TIB. FERRY	80	100	20
TOTAL	<u>17,240</u>	<u>18,200</u>	<u>960</u>

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SP-14

Peak Period

BART (Transbay and Westbay)	21,755	21,600	-155
GOLDEN GATE FERRY	670	600	- 70
AC TRANSIT	2,900	3,000	100
CALTRAIN	1,785	1,700	- 85
TIB. FERRY	150	200	50
TOTAL	<u>27,260</u>	<u>27,100</u>	<u>-160</u>

COMPARISON OF DTP EIR TABLE IV.E.2 (201 Spear St. SEIR Table 3), INCREASED OUTBOUND RIDERSHIP DEMAND FROM C-3 and NON-C-3 AREA TO INCREASE OUTBOUND RIDERSHIP DEMAND FROM C-3 DISTRICT ONLY IN DTP EIR TABLE IV.E.1 (201 Spear St. SEIR Table 2).

1. Muni is not include above for two reasons: (1.) For MUNI NE, NW, and SE there was significant differences between C-3 boundary and regional screenline and (2.) DTP EIR Table IV.E.2 states that MUNI ridership cannot be summed over corridors to give total system demand. Such a sum would incorrectly double count capacity on routes that serve more than one corridor

SP-1

TABLE IV.E.2: OUTBOUND P.M. PEAK-HOUR AND PEAK-PERIOD TRANSIT RIDERSHIPS, PASSENGERS PER SEAT RATIOS (P/S) AND LEVELS OF SERVICE (LOS) (a) AT REGIONAL AND C-3 DISTRICT SCREENLINES, 1981/82, 1984, 1990 AND 2000 UNDER THE DOWNTOWN PLAN (b)

Transit Agency	Screenline(c)	1984				1990				2000				Increase in Transit Demand 1984 - 2000
		Demand		% Change	LOS	Demand		% Change	LOS	Demand		% Change	LOS	
		P/S	LOS	P/S		LOS	P/S	LOS		P/S	LOS			
P.M. Peak Hour														
Muni (g)	Northeast	7,100	1.16	D	9.2	7,900	1.13	D	11.3	8,800	1.05	D	23.9	1,700
	Northwest	8,200	1.26	E	7.9	9,200	1.26	E	12.2	10,100	1.25	D	23.2	1,900
	Southwest	13,500	1.45	E	8.0	15,100	1.44	E	11.9	16,600	1.42	E	23.0	3,100
	Southeast	5,300	1.06	D	8.2	6,200	1.03	D	17.0	7,400	1.01	D	39.6	2,100
BART	Trans-Bay Tube	16,100	1.53	F	8.8	20,500	1.42	E	27.3	27,900	1.42	E	73.3	11,800
	Civic Center	7,700	1.10	D	6.9	8,800	1.26	D	14.3	10,100	1.06	D	31.2	2,400
A.C. Transit	Bay Bridge	9,100	0.94	C	7.1	10,500	1.08	D	15.4	10,500	1.08	D	15.4	1,400
	Golden Gate Bridge	5,300	1.00	C	10.4	6,600	0.86	C	24.5	8,500	0.91	C	60.4	3,200
GGT Bus	Bay	800	0.57	B	14.3	1,100	0.28	A	37.5	1,500	0.38	A	87.5	700
	Tiburon Ferry	200	0.40	A	0.0	200	0.40	A	0.0	300	0.60	B	50.0	100
SamTrans	County Line	1,900	1.12	D	5.6	2,400	1.20	D	26.3	3,100	1.19	D	63.2	1,200
CalTrain (SPRR)	Fourth St. Station	3,100	0.61	B	6.9	4,000	0.65	B	29.0	4,900	0.79	C	58.1	1,800
TOTAL :														31,400
P.M. Peak Period														
Muni (g)	Northeast	12,600	1.06	D	5.0	13,900	1.01	D	10.3	15,500	0.95	C	23.0	2,900
	Northwest	13,100	1.13	D	4.0	14,100	1.07	D	7.6	15,300	1.05	D	16.8	2,200
	Southwest	23,300	1.31	E	5.9	26,000	1.29	E	11.6	28,700	1.29	E	23.2	5,400
	Southeast	9,100	1.00	C	8.3	10,300	0.95	C	13.2	12,100	0.88	C	33.0	3,000
BART	Trans-Bay Tube	25,800	1.54	F	10.7	32,600	1.42	E	26.4	44,100	1.40	E	70.9	18,300
	Civic Center	11,300	0.80	C	6.6	12,800	0.91	C	13.3	14,600	0.77	C	29.2	3,300
A.C. Transit	Bay Bridge	14,000	0.95	C	9.4	17,000	1.16	D	21.4	17,000	1.16	D	21.4	3,000
	Golden Gate Bridge	7,600	0.90	C	8.6	9,500	0.77	C	25.0	12,200	0.81	C	60.5	4,600
GGT Bus	Bay	1,000	0.56	B	11.1	1,400	0.27	A	40.0	1,700	0.33	A	70.0	700
	Tiburon Ferry	300	0.60	B	0.0	400	0.80	C	33.3	500	1.00	C	66.7	200
SamTrans	County Line	2,900	1.12	D	7.4	3,400	1.13	D	17.2	4,500	1.15	D	55.2	1,600
CalTrain (SPRR)	Fourth St. Station	4,500	0.68	B	9.8	5,200	0.64	B	15.6	6,200	0.77	C	37.8	1,700
TOTAL :														46,900

- (a) The values in this table are calculated on the basis of the Downtown Plan's Goals regarding increased transit use and transit service availability not being met. If the Plan's Goals are achieved, transit demand would increase over that shown above and the passengers per seat ratios would improve over those shown above.
- (b) See Table J.10, Appendix J, p. J.36, for descriptions of Level of Service for bus transit.
- (c) Screenlines shown in Figures IV.E.1 and IV.E.2.
- (d) Demand includes both C-3 District riders and transit riders from outside the C-3 District.
- (e) Percent change in demand.
- (f) The years 1990 and 2000 include improvements (increases in the number of seats) scheduled to occur during the 1982-87 and 1983-88 Five-Year Plan cycles for each agency (see Appendix J). Not all of the transit improvements included as implementing actions in the Downtown Plan are included in the improvements assumed to occur.
- (g) Section V.E. discusses the implications of the Plan's Actions.
- (h) Muni ridership cannot be summed over the corridors to give total system demand. Such a sum would incorrectly double count capacity on routes that serve more than one corridor (see text for more discussion).

SOURCE: TJKM Transportation Consultants, Environmental Science Associates, Inc.

ANNOTATED VERSION OF DTP EIR TABLE IV.E.2 SHOWING INCREASE IN TRANSIT DEMAND FROM 1984 TO 2000

These totals are too high because, as footnote g states, adding the MUNI totals double counts MUNI trips. These totals should be considered the upper limit of

TABLE 1 COMMENTS & RESPONSES

PROJECTS TO BE USED FOR LIST-BASED CUMULATIVE IMPACT ANALYSIS
IN DOWNTOWN OFFICE PROJECT EIRS
-March 22, 1985-

Block	Case No.	Project Name	Projects Under Formal Review		Office		Retail	
					(Gross Sq. Ft.)		(Gross Sq. Ft.)	
			Total	Net	Total	Net	Total	Net
			New	New			New	New
* 50	84.230E	Lombard Plaza	75,000	75,000				
* 110	82.129E	1000 Front	139,000	139,000			3,000	3,000
* 112	83.447EA	1100 Sansome/150 Green	60,210	53,210			6,050	6,050
* 142	84.517E	998 Sansome	26,670	24,720				
* 192	83.412ED	1055 Stockton					81,500	66,500
* 195	84.533E	Columbus, Jackson, Kearny	187,150	175,000			19,500	16,380
229	83.222EC	Embarcadero West	611,000	589,000			60,000	60,000
239	85.79E	343 Sansome	373,000	279,800			9,000	9,000
267	84.432E	235 Pine	143,000	143,000			6,000	6,000
312	85.21EC	720 Market	43,000	43,000			6,000	6,000
347	STATE	State Office Building	226,880	226,880				
* 691	84.451E	1200 Van Ness	40,240	38,300			65,600	61,400
* 740	85.22E	619 Larkin	2,910	2,910			1,960	1,960
814	81.540E	101 Hayes	132,000	132,000			6,000	6,000
* 816	84.530E	210 Fell	64,530	49,530			12,120	2,490
* 837	81.5V	Page Plaza (C)	26,160	26,160				
* 3512	84.448E	Van Ness Gateway Center	459,670	459,670			39,960	39,960
* 3520	84.582F	1489 Folsom (C)	9,000	9,000			3,000	3,000
* 3526	83.475V	530-550 9th	42,300	42,300				
3702	83.196E	1169 Mkt, Trinity	820,000	805,000			40,000	40,000
3703	84.539E	1035-45 Market (C)	70,000	60,000			30,000	-60,000
3705	85.73E	55-5th Street (C)	52,430	47,590			41,950	31,150
3708	84.455E	2nd/Stevenson	292,000	292,000			8,000	8,000
3721	84.403	535 Mission	427,000	360,000			4,000	-4,780
3721	83.331E	100 First @ Mission	348,920	342,000				
3721	84.199E	524 Howard	270,000	270,000			4,430	4,430
3735	83.313E	35 Hawthorne	47,400	47,400			2,900	2,900
3736	84.358E	201 2nd @ Howard	29,300	29,300			4,900	4,900
3736	83.311E	299 2nd @ Folsom	267,760	232,760			15,580	13,630
* 3744	84.41E	Hills Bros (C)(M)	635,000	535,000			40,000	40,000
* 3747	85.58E	300 Beale (C)(M)	130,670	130,670			4,700	4,700
* 3749	83.464EV	50 Guy Place	17,500	17,500				
* 3761	84.299E	220 Harrison					10,000	10,000
* 3769	83.213EV	59 Harrison (C)	113,500	49,750				
* 3786	84.504E	340 Townsend	48,000	48,000			1,300	1,300
* 3788	82.352EV	640 2nd	39,100	37,400				
* 9900	SFRA	Rincon Point/S. Beach	65,000	65,000			20,000	20,000
* many	SFRA	YBC (misc. bldgs)	621,000	621,000				
TOTAL UNDER FORMAL REVIEW			6,956,300	6,498,850			547,450	403,970

DEPT. OF CITY PLANNING

Non-C-3 projects

1. 121,000 gross and net square feet of YBC (misc. Bldgs) is in the non-C-3 area.

Projects Approved, Not Yet Under Construction
-March 22, 1985-

Block	Case No.	Project Name	Office (Gross Sq. Ft.)		Retail (Gross Sq. Ft.)	
			Total New	Net New	Total New	Net New
* 59	83.177E	1620 Montgomery	82,270	45,390		
* 113	82.418EVAD	1171 Sansome	22,000	22,000		
* 130	83.612C	1558 Powell	2,500	2,500		
* 136	83.476V	962 Battery	15,000	15,000		
* 176	82.368E	900 Kearny	25,000	25,000	5,000	5,000
* 194	83.128E	732 Washington	17,500	17,500	11,240	11,240
* 225	81.403ED	814 Stockton	3,500	3,500	3,300	3,300
227	82.463E	505 Montgomery	314,000	287,400	12,100	-4,780
236	82.511E	222 Front	20,800	13,940	3,250	-0-
271	83.13E	582 Bush	18,100	18,100	800	800
288	83.148E	665 Bush (M)	12,400	2,600		-2,700
294	82.87D	44 Campton Place	7,600	7,600		
309	83.333E	212 Stockton	32,220	15,890	21,700	16,200
326	83.86E	156 Ellis	3,200	3,200		
327	82.445E	Stockton/O'Farrell	43,300	25,750	57,950	28,000
* 336	83.21ECV	440 Turk	25,000	8,150		
* 671	82.24V	1581 Bush (C)	16,000	16,000		
3702	81.549ED	1145 Market	137,500	108,500	8,000	8,000
3705	83.314E	5th and Market	535,000	535,000	120,000	40,000
3705	80.315	Apparel Mart III	332,400	332,400		
3706	84.599D	799 Market @ 4th (C)	98,400	48,800	53,230	-48,800
3708	83.75E	49 Stevenson	169,600	136,900	9,800	-2,900
3735	SFRA	Yerba Buena Center	480,000	480,000		
* 3750	82.241E	600 Harrison	228,000	228,000	10,000	10,000
* 3750	82.77V	642 Harrison (C)	54,400	45,900		
* 3789	81.552EV	625 2nd/Townsend (C)	157,000	157,000		
* 3794	82.416EV	155 Townsend	19,000	19,000		
* 3803	81.244D	China Basin Expansion	196,000	196,000		
* 9900	81.63E	Ferry Building Rehab	309,500	97,500	163,500	124,000
many	SFRA	Yerba Buena Gardens	1,250,000	1,250,000	201,000	201,000
many	SFRA	Rincon Point/S.Beach	635,000	635,000	185,000	185,000
			*****	*****	*****	*****
TOTAL APPROVED			5,262,190	4,799,520	865,870	573,360

Projects Under Construction
March 22, 1985

Block	Case No.	Project Name	Office (Gross Sq. Ft.)		Retail (Gross Sq. Ft.)	
			Total New	Net New	Total New	Net New
* 58	82.234E	Roundhouse (C)	45,000	45,000	3,000	3,000
* 65	82.168V	990 Columbus	12,000	12,000		
* 112	81.258	Ice House (C)	209,000	209,000		
* 136	81.243E	955 Front/55 Green	50,000	50,000		
* 143	81.353ED	1000 Montgomery (C)	39,000	39,000		
* 146	83.99EC	644 Broadway	42,800	42,800		
* 161	DR80.191	Mirawa Center	36,000	36,000	30,650	30,650
* 164	81.583D	50 Osgood Place	22,500	22,500	9,100	9,100
* 166	DR80.15	750 Battery	105,400	105,400	12,800	12,800
* 166	CU81.7	222 Pacific at Front (C)	142,000	142,000		
* 167	SFRA	Golden Gateway III	103,000	103,000		
* 176	81.673EACV	Columbus/Pacific(Savoy)	49,000	49,000	22,000	22,000
* 176	83.229E	801 Montgomery	31,800	31,800	6,200	6,200
208	81.104EDC	Washington/Montgomery (M)	235,000	233,300	4,000	-1,200
227	EE80.296	Bank of Canton	230,500	177,500		-800
239	DR80.1	456 Montgomery	160,550	160,550	24,250	24,250
240	81.705ED	580 California/Kearny	329,500	260,000	6,500	6,500
261	81.249ECQ	345 California (M)	640,000	466,500	15,500	15,500
262	81.206D	130 Battery	41,000	41,000		
265	81.195ED	388 Market at Pine (M)	234,500	85,500	10,000	-8,500
268	81.422D	250 Montgomery at Pine	105,700	65,700	8,000	8,000
270	81.175ED	466 Bush	86,700	86,700	7,800	2,200
* 271	81.517	453 Grant	27,500	27,500	6,200	6,200
288	81.461EC	333 Bush (Campeau)(M)	498,400	458,100	20,900	20,900
288	81.687ED	222 Kearny/Sutter	150,000	49,950	10,000	-8,400
288	DR 80.24	101 Montgomery	264,000	234,000	4,900	-14,100
289	81.308D	One Sansome	603,000	603,000	7,000	7,000
311	82.120D	S.F. Federal	246,800	218,850	1,600	-9,440
351	DR79.24	Mardikian/1170 Market	40,000	40,000		
* 641	82.200CV	1735 Franklin (C)	8,600	8,600		
* 642	83.218V	1699 Van Ness	20,000	20,000		
* 642	82.224VEC	1750 California	82,530	82,530		
* 672	SFRA	Wealth Investments	104,500	104,500		
* 690	SFRA	Post/Van Ness	60,000	60,000	20,000	20,000
* 716	81.581ED	Polk/O'Farrell (M)	61,600	61,600	22,400	22,400
* 743	SFRA	Van Ness/Turk (Vanguard)	85,000	85,000		
* 767	STATE	State Office Building	293,300	293,300		
* 818	83.94EV	583-591 Hayes (C)	4,900	4,900		
834	82.603E	25 Van Ness (C)	101,800	42,800	36,400	36,400
* 3504	82.137V	44 Gough	30,000	30,000		
* 3512	82.14	Van Ness Plaza	170,000	170,000	6,000	6,000
3704	83.404	901 Market (C)	145,500	126,000	80,000	80,000
3707	81.492ED	90 New Montgomery	124,300	124,300	3,350	3,350
3707	81.245DA	New Montgomery Pl.	227,500	209,700	2,200	-3,900
3708	81.493ED	71 Stevenson	324,600	324,600	6,200	6,200
3709	81.113ED	Central Plaza	353,100	136,300	17,400	17,400

Projects Under Construction (Continued)

3715	82.16EC	121 Steuart	33,200	33,200		
3715		141 Steuart	80,000	80,000		
3715	SFRA	Rincon Pt. Site A	79,000	79,000	11,000	11,000
3717	81.183E	123 Mission	342,800	342,800		
3717	82.82D	135 Main	260,000	260,000	4,000	4,000
3717	EE79.236	101 Mission	219,350	219,350		
3717	EE80.349	Spear/Main (160 Spear)	279,000	279,000	7,600	7,600
3722	81.417ED	144 Second at Minna	30,000	30,000		
3724	81.102E	Holland Ct. (C)	27,850	27,850		
3729	82.86D	774 Tehama	5,800	5,800		
*3733	82.29E	832 Folsom	50,000	50,000		
3738	DR80.5	315 Howard	294,000	294,000	3,200	3,200
3741	82.203C	201 Spear	229,000	229,000	5,200	5,200
*3749	EE81.18	Marathon - 2nd/Folsom	686,700	686,700	35,300	35,300
*3764	82.591E	Second St. Sq. (C)	333,000	263,000	25,000	25,000
*3775	81.147V	338-340 Brannan (C)	36,000	36,000		
*3787	81.306	252 Townsend at Lusk	61,000	61,000		
*3794	83.545V	139 Townsend	51,200	50,000		
*3794	81.569EV	123 Townsend	104,000	49,500		
*3923	81.491EVF	1550 Bryant	80,600	49,600		

TOTAL UNDER CONSTRUCTION			10,260,380	9,105,580	495,650	411,010
GRAND TOTAL ALL PROJECTS			22,478,870	20,403,950	1,908,970	1,388,340

(C) - Conversion (generally industrial and/or warehouse to office)

(M) - Mixed Use (office/residential/commercial)

This list was developed solely for the process of assessing the environmental impacts of proposed new office projects in downtown San Francisco. The list includes all projects for which an application has been received and which are not part of the baseline. The baseline is current to 1984. Because no later baseline has been established, this list may identify as "under construction" projects which have been completed and substantially occupied since March 1984.

43598

ATTACHMENT II: NEWSPAPER ARTICLES (AND LETTER TO BOARD OF
SUPERVISORS FROM MAYOR FEINSTEIN) SUBMITTED AND/OR
REFERENCED BY SFRG

S F. PROGRESS

BART faces budget woes

BART has introduced a tentative budget totaling \$173 million for fiscal year 1986-87.

The proposed budget represents a 5.6 percent increase over the transit district's current year's expenses of \$164 million.

BART general manager Keith Bernard told members of the administration committee Thursday that BART is facing a \$7 million deficit in its current budget due to less revenue than anticipated from fares and sales tax receipts.

Bernard is proposing that BART reverse its shortfall by transferring \$4.2 million currently earmarked for improvements at the Daly City station to the district's operating budget and through other cost-cutting measures.

The proposed budget for the coming fiscal year anticipates an increase in passenger revenue from a current estimate of \$74.3 million for 1986 to \$84.2 million in 1987.

BART officials are expecting the rise in patronage to come with the recent completion of a

new \$24 million track through downtown Oakland and the addition of two commuter trains to the system by next January.

28/9/83

Office of the Mayor
SAN FRANCISCO

February 13, 1986



DIANNE FEINSTEIN

The Honorable
Members of the Board of Supervisors
Room 235, City Hall
San Francisco, CA 94102

Dear Ladies and Gentlemen:

Last Thursday President Reagan released the administrations proposed budget for FY 87.

The key features of the Presidents' budget proposal are:

- o No tax increases
- o An Increase In Defense Spending Of Approximately \$34 billion.
- o Domestic Cuts Of Approximately \$38 billion.

The President has taken the political tack of not requesting any tax increases in his proposed FY 87 budget. While he is proposing to raise some minor revenues through the sale of the Tennessee Valley Authority and selected petroleum reserves as well as increasing user fees, this will generate only about \$6 billion dollars.

The President has proposed an overall defense spending increase of approximately \$34 billion. This would raise the total defense expenditure proposed for FY 87 to just over \$320 billion -- an astounding increase when you realize that in 1980 defense spending was only \$134 billion.

The major "impacts" of the Presidents' budget will be felt on the domestic side through proposed reductions in domestic spending in FY 87 of \$38 billion. The President proposes to get this \$38 billion in cuts in the following way.

- 1) The recision of \$10.3 billion in already approved and authorized FY 86 funds. This will impact some 79 federal programs, many of which in turn affect the City and County of San Francisco.
- 2) Elimination of over 40 federal programs, many of which serve the City and County of San Francisco.
- 3) The reduction and consolidation (with reduced funding) of many federal programs.

The President hopes through the elimination and reduction of federal programs to generate over \$28 billion in reduced federal spending for domestic programs in FY 87.

A list of the administrations proposed recisions, terminations and reductions is attached for your review. Also attached is a summary of what we feel are some of the estimated possible impacts on San Francisco city government, on departments and programs that broadly benefit San Francisco, and, on business in San Francisco.

It is important to note that in FY 85/86 San Francisco received over \$536 million in state and federal funds that pass through the City budget process. This is approximately 1/3 of our city budget of \$1.7 billion. If the Presidents' budget or a budget basically similar to it is passed by Congress the impact on the City and County of San Francisco will be extensive.

Some specific programs that may be affected will include:

- The loss of revenue sharing funds some \$21 million a year which go to support Police, Fire, Muni and Rec-Park activities.
- Muni operating and capital grants of \$30 to \$50 million a year will either be eliminated or reduced significantly.
- Numerous health grants coming to San Francisco General Hospital and the Health Department for programs such as AIDS research are marked for reduction.
- Sewage treatment funds are going to be restricted to existing programs and then phased out by 1990 putting at risk over \$110 million in projects requiring federal funds and jeopardizing over \$25 million in state funding.
- Federal Aid Urban monies are also earmarked for reduction and termination. These monies directly assist Muni and DPW fund street repair.
- In addition to these large impacts, numerous city departments from the Purchaser (who gets a grant from the department of commerce to fund our MB/WBE program) to the Commission on Aging to the Arts Commission to the Planning Department all receive federal assistance.

Aside from direct federal funds that flow to the City, a large amount of federal funding flows directly to assist the private sector in the form of SBA loans or Urban Development Action Grants or to fund assistance to community groups. Low income, elderly, the homeless, etc. These programs include AFDC, Community Development Block Grants and refuge assistance and housing programs.

The impact on the City of the loss of these federal funds is both direct and indirect. Direct loss results from the loss of current and future year funding. The indirect impact is in the form of "lost leverage" to generate private capital investment in the City or job creation and the loss of direct Federal support to individuals.

- As an example, SBA loans last year helped create 431 jobs by supporting small business activity in the City for which other funding is often not available.
- The Community Development Block Grant program last year benefited over 117,000 people (over 40% of our low income city population). Over 5,000 jobs were directly created through this program and the loss of funding would mean that these 117,000 served people through 130 non-profit community agencies will not get this needed service.
- Urban Development Action Grants are also earmarked for termination. In the last five years, nine actions grants have been funded representing a Federal investment of over \$19 million which in turn created in San Francisco over 2,700 jobs and leverage close to \$100 million in private investment.

The loss of these federal dollars will have an immense impact on people and the city as a whole. Thousands of jobs will not be created and millions in private funds will not be invested in the City. Thousands of people who can least afford to pay the full cost of needed services will be faced with the termination of those services.

As a final note, it is obvious that President Reagan is initiating not just a termination and reduction of some federal programs but the President is proposing the termination of the basic federal, state and local partnership that has existed for generations.

The irony is that it has been under the Reagan administration that the problem of national deficits has emerged as a major financial crisis. It is the spending policies and program priorities of the Reagan administration, still reflected in the proposed budget, that have created the huge deficit gaps that now have to be filled at the expense of programs that care for the elderly, the handicapped, or those basically dependent on society for general assistance. Hardest hit are those programs where the constituencies are least able to defend themselves to the benefit of an ever increasing federal defense budget.

A further irony is that states, local governments and individuals who are the primary beneficiaries of the services that the President is proposing to terminate are being asked to continue to pay for a federal government, that is cutting their basic level of domestic service.

Honorable Supervisor Molinari

Page 4

February 13, 1986

The truth is that the President has imposed a tax increase on the American people - It is a tax increase because the cost of government is going up relative to the level and quality of Domestic services being provided to the American people.

Sincerely yours,


Dianne Feinstein
Mayor

DF/FA:11a

cc: Honorable John L. Molinari, President
Honorable Harry G. Britt
Honorable Richard Hongisto
Honorable Willie B. Kennedy
Honorable Quentin L. Kopp
Honorable Bill Maher
Honorable Wendy Nelder
Honorable Louise H. Renne
Honorable Carol Ruth Silver
Honorable Nancy G. Walker
Honorable Doris M. Ward
Mr. John Taylor, Clerk of the Board
Mr. John Farrell, Controller

February 13, 1986

REAGAN FY 1987 BUDGET
IMPACT ON SAN FRANCISCO
(selected programs)

"Direct" Impact on Depts	Current Funds (in millions)	"At Risk" (Funds through 1990 in millions)
o Revenue Sharing	\$21	\$84
o Muni Operating Grants	\$8.9	\$35.6
o Muni Transit Funds (section 3 grants)	\$20 (5 yrs average) (Federal support)	\$80
o Muni Capital Funds	\$20	\$80
o Health Grants	\$1.5	\$6
o Sewage Treatment Funds (loss of \$25 mill state \$)	-	\$110 (\$25)
o Federal Aid Urban	\$3.1	\$12.4
o Other City Departments (Purchaser, Planning, Aging, Arts)	\$2.5	\$10.0
Potential Federal \$ Loss	\$77	\$418

Othe Selected Impacts	Current Funds (in millions)	"At Risk" (Funds through 1990)
o SBA loans	\$6.2	\$25.2
o UDAG's	\$.542	\$2
o AFDC (\$40.7 cut 14%)	\$5.6	\$22.4
o Highway Funds: I-280 Funds Embarcadero Freeway		\$10 \$24
o CDBG	\$14.6	\$58.4
o Refuge Asst (\$2.5 cut 50%)	\$1.25	\$5
Housing Authority	\$12.8	\$61.2
Potential Federal \$ Loss	\$40.9	\$208.2

BRIDGE

— From A-1

during peak commute hours. Vehicles heading west across the bridge between 7 a.m. and 8 a.m. carried an average of 2.16 people last year, compared with 1.58 in 1976. But of the average 8,500 cars and trucks counted during the one-hour period, 4,000 had a single occupant.

In all, about 80 percent of the commuters during peak hours rely on public transit, van pools and car pools.

Daily trans-Bay ridership on BART, in fact, climbed from 72,200 in 1980 to 111,900 in 1985 — a 55 percent jump, according to BART spokesman Sy Moubert.

At the same time, however, AC Transit ridership across the bridge has dropped dramatically, from 38,000 passengers a day in 1980 to about 29,000 now. That is a 24 percent reduction.

AC Transit spokesman Mike Curry said many of the company's trans-Bay riders have switched to BART in recent years as memories of the deadly 1979 train fire in the trans-Bay tube have faded and passenger service has improved. At the same time, AC Transit has reduced midday bus service between The City and the East Bay.

While Caltrans officials have encouraged ride sharing and greater use of public transit to help ease bridge congestion, they concede they have few easy solutions to the traffic crisis.

Planned road improvements along Interstate 80 in the East Bay, including the construction of nine miles of special lanes reserved for buses and car pools, are expected to improve traffic flow to the bridge. But Caltrans officials said it won't do anything to solve the problem of limited capacity on the upper and lower decks.

The bridge, which has five lanes in each direction, carries a maxi-

mum of 1,800 cars per lane every hour. The flow is reduced considerably every time there's an accident — something that has become a daily occurrence, according to the CHP.

For example, in the first quarter of the 1985-86 fiscal year, beginning July 1, 1985, there were 267 accidents reported on the bridge, including 87 resulting in serious injuries or towed vehicles. That doesn't count the scores of cars that stalled on the bridge and tied up traffic.

"There are no shoulders on the bridge, so any time there's a stall you have to push the car off the bridge or wait for Caltrans to tow it," Mattos said. "There's a significant delay for every (accident or stall) on the bridge."

Caltrans plans to install television monitors on the bridge to help identify tie-ups quickly and improve the response time of tow crews.

"The intent is to have the bridge operate at capacity for a higher percentage of time," Deasy said.

Transit officials also have proposed constructing a special lane on the outside of the bridge solely for maintenance crews. Because of the lengthening commute period, Caltrans workers said they have found it harder to close lanes for routine bridge repairs.

Construction is just beginning on a new Bay Bridge toll plaza, although drivers will notice little difference in service. The replacement booths are being installed primarily to protect toll collectors from poisonous auto exhausts.

At least one possible solution to the bridge crisis was rejected more than 20 years ago when Bay Area voters turned down a plan to build another span, referred to as the Southern Crossing, between Alameda and San Francisco's Hunters Point.

"If we ever get gridlock, I suppose it might generate talk of a Southern Crossing again," Halligan said.

Eviction rate soars: Study says lower-income tenants suffer most

By Corrie M. Anders
of the Examiner Staff

In 1985, for the fourth consecutive year, the number of evictions filed against San Francisco renters continued to increase, a tenant activists' group announced today.

Most eviction efforts, according to an analysis by the San Francisco Tenants Union, have occurred in lower-income neighborhoods predominantly occupied by minorities.

The report was prepared by the Tenants Union, which analyzed cases filed in Municipal, Superior, and Small Claims courts and eviction inquiries received by the City's rent control board. It showed that:

- A total of 6,195 evictions cases were filed last year in Municipal Court, a 32 percent increase over filings in 1983.

- Another 1,043 eviction cases were filed in Superior and Small Claims courts.

- Reports of wrongful evictions cases filed with the rent board increased to 940 cases, compared with

882 the previous year.

- The number of cases referred to the Sheriff's Department for actual eviction totaled 3,173 in fiscal 1985.

Fewer than half of the court cases filed against tenants ever reach the point where the sheriff is called in. And not all of those result in the tenant being forcibly removed.

But in a city where home prices and rents are among the highest in the nation, tenant activists said the overall statistical indicators "continue to show the ominous upward motion of the last four years."

A combination of factors is fueling the eviction spiral — from tenants unable to pay rents to gentrification to new landlords who have high mortgage payments, said Jim Faye, a spokesman for the Tenants Union.

"Real estate is just booming again, and landlords have to meet their mortgages," Faye said. "They look at those low rents and say 'I have to get rid of these people — by hook or by crook.'"

In addition, Faye said more upscale home buyers "looking for a piece of San Francisco" are moving into transitional neighborhoods and a "disproportionate" number of eviction cases involve blacks, se-

nior, low-income and Third World people.

"These figures point to a tragic and intolerable situation that must come to an end, or San Francisco as we know it will come to an end,"

the group said.

The neighborhoods with the highest rate of eviction activity were: Visitation Valley, 43.7 percent; Hayes Valley, 28.8 percent; Western Addition, 26.4 percent;

Potrero Hill, 24.4 percent; Bayview Hunters Point, 21.8 percent; Inglewood, 21.8 percent; Inner Mission, 21.2 percent; South of Market, 16.9 percent; Crocker-Amazon, 16.6 percent; and Civic Center, 15.5 percent.

EX-11
21

'Hit List' Targets

5 Bus Lines Saved From Muni Ax

By Carl Nolte

The Municipal Railway worked out a budget compromise with Mayor Dianne Feinstein's office yesterday and scrapped plans for service cuts that were in the works for later this year.

The action saved five bus lines and San Francisco's Historic Trolley Festival, which were on a Muni "hit list" circulated in an internal memorandum last month.

The list, which included service reductions on seven other bus lines, was drawn up at the request of Rudolf Nothenberg, general manager of utilities, because of an unanticipated \$4.2 million budget shortage.

Yesterday's budget provides for a shortened trolley festival, avoids any service reductions, and saves the five lines — the 13-Guerreiro, the 14L-Mission Limited, the 45S-Shuttle, the 56-Rutland and 70-Lake Merced.

Nothenberg told the Public Utilities Commission yesterday that he and the mayor's office had worked out a deal so that Muni could get what it needed for the fiscal year beginning July 1.

He said they had, in effect, divided up the \$4.2 million shortage. "The PUC found some other places to cut," he said, "and the mayor raised our budget ceiling."

The Muni cut back on liability coverage and on its reserves for claims against the railway, and made other "small cuts in the budget," Nothenberg said.

One of the trims was in the trolley festival, which will be scaled back to a five-day-a-week operation.

Although the Muni comes nowhere near covering its operating costs from fares, by law it cannot operate at a deficit, and its 1986-87 budget of \$222.7 million will need an infusion of \$101.4 million from the city's general fund.

The City Hall battle was over the general fund money. Feinstein,

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WED., FEB. 12

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tough fiscal times, had told city departments to keep their financial requests to a minimum.

The process ran into trouble when a secret memo outlining Muni cuts leaked out just three weeks after the Muni had raised its fares.

Yesterday's deal is contingent on a couple of factors that may not pan out. The mayor's budget calls for \$8.1 million in federal operating assistance to the Muni, and that money is not contained in the budget that President Reagan unveiled last week. The thinking in San Francisco's City Hall, and in other cities, is that cuts in federal transit assistance will not survive the budget process.

If the Reagan budget passes, or if the city has guessed wrong about the complex federal budget, the Muni will be in the financial soup again.

In either case, Mayor Feinstein has indicated that the Muni will have to take a 10 percent cut in general fund money, which will mean significant cuts in service.

In other action yesterday, the PUC voted 4 to 0 to authorize the Muni to begin negotiations with a private consultant for a \$400,000 maintenance management pro-

BUSTED

The latter ultimately depends on lower interest rates and a smaller trade deficit resulting from major cuts in federal deficits.

Anthony Downs is a senior fellow at the Brookings Institution, which has just published his book "The Revolution in Real Estate Finance." This article first appeared in The Wall Street Journal.

By Anthony Downs

REAL-ESTATE practitioners already know office-space surpluses are at record levels, but many don't know why. The answer is simple: office overbuilding is no longer cyclical. A chronic bias in capital markets is pouring too much money into nonresidential real estate, with no letup in sight. Moreover, resulting declines in effective rents threaten the prosperity of well-established, fully occupied office buildings — not just brand-new ones. In fact, if high inflation, rampant in the next two years, the failure of office rents to rise along with it might destroy the belief that real estate is a good hedge.

Office vacancy in 31 major metropolitan areas has risen from less than 5 percent in 1981 to over 16 percent in downturns and almost 30 percent in suburbs in June 1985, according to Coldwell Banker. The Office Network estimated that 156 million square feet of new space was being built in summer 1985 in 22 markets. But total absorption there was 71.2 million square feet in the boom year 1984. So vacancies will rise further in most markets during the next two years.

leaprate office landlords are trying to steal tenants away through major rent concessions. As a result, effective rents in markets with large space surpluses are falling. This is partly disguised by "free- rent" periods. Landlords hope a tenant with a contract rent of \$22 per square foot, for 24 months of free rent at the start of a 60-month lease, will still perceive the rent as \$22 when it comes time to make a new lease. But the effective rent is only \$13.20 — and that is where smart tenants will be negotiating.

Existing office buildings must meet this competition as leases expire. As a result, many will not be

the steady rent increases their developers projected, and are already worth less than was thought. Thus, a lot of overvalued office property is on the books of individuals and major financial institutions.

How did such overbuilding come about, and why is it continuing? Since 1983, capital has rushed into nonresidential markets from five sources: savings and loans, banks, syndicators, foreign investors and pension funds. Each has its own reasons for continuing to invest in nonresidential real estate, in spite of escalating risks. The result is a bias in capital markets favoring residential investment.

Syndicators, savings and bonds, and banks can offer investors higher yields than they themselves must pay for, because of federal benefits to their investors. For syndicators, the benefit is tax shelter. Increased by the 1981 Tax Act, for savings and bonds and banks, the benefit is federal deposit insurance. Since last 1962, they have offered such insurance combined with savings rates unlimited by regulations. As a result, investors have flooded these institutions with money since 1963.

Syndicators must invest that money in real estate. Savings and loans gain tax benefits by doing so, and high interest rates have restricted loan demands for single-family homes. Banks have been making real-estate construction loans not only for the big transaction fees but because of weak or too-risky loan demand elsewhere. Former bank borrowers have been using commercial paper, and the high value of the U.S. dollar has weakened loan demand among U.S. industries with foreign competitors. And even a huge new office building in downtown Houston, one bank official involved was heard to say, is a better risk than lending to Argentina!

Foreign Investment like U.S. real

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tion Street, Harrison Street to The Embarcadero. The building offers a view of the bay and of the city from the top of the building.

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***** 3

BART Ridership At Two-Year Low

By Harre W. Demoro

BART's daily passenger count has dipped below 200,000 for the first time in two years, and the transit agency's revenues are running lower than expected after the 30 percent fare increase January 1.

Weekday ridership has dropped 6.2 percent — from a 210,000 daily average in October-December to 197,000 in January, officials said yesterday.

Along with the fare increase, falling gasoline prices, jammed station parking lots and late and overcrowded trains also may be discouraging riders, officials said.

"We are not doing all that well. The gross passenger revenue is down (from estimates)," said William Goelz, BART treasurer-controller.

Fare revenues for the seven months ended January 30 totaled \$38.9 million, nearly \$2 million, or 4 percent, less than the budgeted \$40.9 million, Goelz said.

Although service cuts will not be necessary, Goelz said, some capital projects might be put off unless the passengers return.

Ridership losses were made up

in six months after fares rose 20 percent in 1982, said BART spokesman Sy Moubert. The recovery could take longer this time because the increase was 30 percent.

In addition, if gasoline prices continue to fall commuters may decide to drive or use car pools instead of BART, said Ward Belding, BART research office supervisor.

The last time the weekday average ridership dipped under 200,000 was in September 1983, officials said.

Thousands of weekend riders also have deserted the system, apparently because of the fare increases, said Belding.

Saturday ridership plummeted from an average of 97,200 in October-December to 74,500 in January. The Sunday average dropped from 47,800 in October-December to 38,800 passengers.

Some drop in weekend totals is expected because thousands of Christmas shoppers rode BART in November and December, Belding said. But the January 1986 totals are well below 1985 figures of 79,300 for Saturdays and 42,500 for Sundays — because of the fare increase.

Grim Forecast on East Bay Traffic Problem

By Elliot Diring

A near-doubling of commute traffic during the next 20 years will create miles of jammed highway throughout the East Bay's high-growth corridor, according to a report released yesterday.

The nightmarish vision of grueling stop-and-go commutes was produced by the Metropolitan Transportation Commission, which now hopes to devise a plan to keep the dire predictions from coming true.

"The highway picture is a bleak one," said commission planner John McCallum, who presented the new figures to transportation officials meeting in Walnut Creek.

The draft report uses the most up-to-date population data available to project traffic conditions in the year 2005 along the major roadways linking the growth hot spots of Alameda and Contra Costa counties.

It predicts a 92 percent rise in morning commute traffic over 1980 levels.

Even with millions of dollars in planned transit and highway improvements -- such as the reconstruction of the Interstate 680/Highway 24 interchange, the widening of I-680 and several new bus lines -- rush-hour traffic will be at a virtual standstill on many key routes, the report concludes.

In many places, there will be more cars than the roads were de-

signed to handle. They include:

- Southbound lanes on the Benick-Martinez Bridge.

- Southbound I-680 through central Walnut Creek and from Olympic Boulevard south to Crow Canyon Road. Northbound I-680, north of the Highway 24 interchange.

- Highway 4 east and west of Antioch.

- Highway 24 south to I-680.

Westbound traffic through the Caldecott Tunnel already exceeds capacity, and a projected 13 percent increase will mean even longer

waits, according to the report.

One encouraging figure was a projected increase in the proportion of commuters using mass transit, from 7.8 percent to 11.2 percent.

Yesterday's meeting included officials from affected jurisdictions, whose comments will be used to refine the figures.

Once the numbers are final, said McCallum, they will be plugged into computer models to assess various combinations of possible transit and highway improvements.

Those evaluations, in turn, will produce a set of recommended solutions, due sometime this summer, he said.

EDITORIALS

SF CHRON 2-14-86

Mass Transit's New Problems

WITH SOME CONCERN, we learned that ridership on the Golden Gate Bridge bus system and on the Bay Area Rapid Transit system are both in decline. The implications for already congested bridges and for San Francisco's congested downtown streets are not at all good.

The bridge system buses have actually lost 23.3 percent of their patronage over the last five years. Part of the loss has been caused by Marin commuters abandoning public transit to return to private cars, a switch which must be regarded with alarm at the San Francisco City Hall. More vehicles are crossing the bridge to enter the city, but are actually carrying fewer people in total.

The BART decline is no less dramatic, or alarming. Fares were increased by 30 percent on January 1. Since then, weekday patronage has declined by 6.2 percent and is below 200,000 for the first time in two years. There is supposition that the drop in gasoline prices has influenced this decline, by luring more commuters back to their cars, and may influence it even more if prices at the pump continue to drop.

THE TREND TOWARD increased use of private vehicles and away from public transit is one that must be reversed, particularly for commuters who work in downtown San Francisco but live in the suburbs. It is obvious that inducements continue to favor the use of the private auto to get to work. This must be changed.

BofA sites for lease add to office glut

By Bruce Koon
STANDARD REAL ESTATE EDITOR

By moving ahead with plans to relocate thousands of office workers, BankAmerica Corp. will free up more than 850,000 square feet for sublease in a commercial real estate market already swimming in vacant space.

The bulk of the San Francisco space to be subleased is at 150 Spear St., Embarcadero Center Two, 201 Mission St. (also known as the Pacific Gateway Building), and the bank's world headquarters at 555 California St., according to Dan Costello, BofA senior vice president, corporate real estate. Large chunks of space also will be vacated at 22 Fourth St., 30 Van Ness Ave., and 10th and Market streets.

Most of the space will become available this year. The 855,103 square feet of space is roughly the equivalent of two of The City's newest office buildings, California Center and Van Ness Plaza.

"It probably will have a dampening effect" on leasing, Costello said yesterday. "There is so much space on the market and no increase in demand."

Some leasing brokers argue that sublease space drives down rents more than new space. That's because lesseholders, who are paying rent on space they don't need, are anxious to get rid of it.

"Because sublease space is usually offered at below-market rates... the effects upon the direct space and new building rental rates will be dramatic," says Joe Del Hierro of Royal LePage Commercial Real Estate Services, formerly Fuller Commercial Brokerage Co.

BankAmerica's office space for lease

Building	Square feet
150 Spear St.	144,060
Embarcadero Center Two	134,249
201 Mission St.	128,878
World Headquarters	88,321
22 Fourth St.	79,556
30 Van Ness Ave.	68,537
10th and Market streets	48,485
596 Market St.	41,911
799 Market St.	34,580
1300 Market St.	33,840
2001 Mission St.	10,884
33 New Montgomery St.	10,789
3555 Geary Blvd.	7,408
110 Sutter St.	6,981
120 Montgomery St.	6,810
315 Montgomery St.	4,800
6150 Mission St.	4,800
275 Ellis St.	3,871
Total square feet:	855,103

Sources: BankAmerica Corp. and leasing brokers

BankAmerica's World Headquarters at 555 California St. in The City

Examiner / David Linton

SPACE

— From C-1

such as a year's free rent, generous offers to "build out" or arrange the space to suit the tenant's needs, cash disbursements and move-out allowances are common.

Costello said BofA isn't quoting rents but asking brokers to come up with "fair-market" prices they think can bring in specific tenants.

"We will be competitive, but we told them we won't bust the market by renting at depressed prices."

Costello said the bank won't empty entire buildings as once planned because it's less expensive to sublease part of a building than an entire structure. For example, "there are more tenant improvements" involved in an empty building than a partly empty building, he said.

"It just would have cost more" under the original plan, he said.

About 75,000 square feet already has been vacated. "The musical-chair game" of relocating employees will begin soon, Costello said.

But Costello also said the extra space "might keep some people from moving out" of San Francisco. "It could go either way."

BofA has 24,119 employees in the seven-county Bay Area, 15,079 in San Francisco. By year end, 3,000 to 4,000 employees will be relocated to three sites in Concord, Costello said. Others are being consolidated at sites within San Francisco.

Already, 950 employees have been moved to BofA's new \$160 million Technology Center in Concord.

Royal LePage estimates that as of April 1 the vacancy rate for the Financial District was 15.1 percent, for the new financial district South of Market 22.7 percent and for the Van Ness corridor 23 percent.

(Brokerage-firm vacancy rate estimates vary, depending on the number of buildings and types of buildings surveyed.)

BofA will have to be aggressive in its marketing because of the high vacancy rate, brokers say. According to the brokers, some of the subleases are too short-term to make them very attractive, and BofA is trying to persuade building owners to grant longer terms on them.

Much of the BofA space is so-called "back office space," designed to accommodate large pools of clerical and administrative employees. Those are the types of workers corporations have been moving to the East Bay and elsewhere.

Gross annual rents for prime office space in The City already have dropped considerably in recent years, ranging from \$28 a square foot to the low \$20s in many buildings. Commercial brokers say concessions

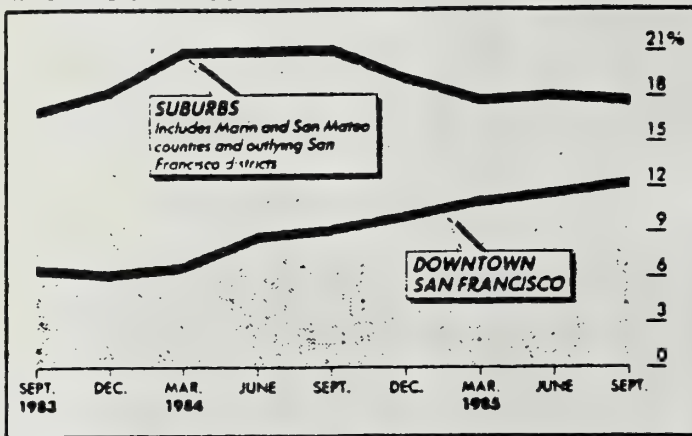
— Please see SPACE, C-2



Consultant Monica Finnegan

S.F. OFFICE VACANCY RATE CLIMBS

VACANCIES IN SUBURBS LEVEL OFF



Source: Coldwell Banker

Wednesday, December 4, 1985

S.F. Office Rental Rates May Tumble

From Page 23

reached 21.2 percent as a sluggish economy and rapid building combined to create a glut of offices.

Coldwell Banker officials issued their prognosis before real estate executives, investors and developers gathered at the Sheraton Palace Hotel last night.

While the real estate company had mixed reviews on offices, it was bullish on the Union Square retail district.

With five major department stores, the nearby Financial District, 20,000 hotel rooms and an efficient transportation system, Union Square commands among the highest lease rates in the country, said Robert Isackson of Coldwell Banker, around \$80 to \$120 a square foot a year.

S.F. Office Rent Rates Expected to Fall

By Stephen Maita

San Francisco's downtown office market will become even more saturated next year, with rental rates falling to levels not seen in at least five years.

That's the forecast by Coldwell Banker, the nation's largest real estate company, in its annual overview of San Francisco's real estate market yesterday.

The real estate firm said 18 new buildings will be unveiled in 1986 and 1987. As a result, the vacancy rate over the next two years could reach 16 percent to 18 percent — up from about 13 percent this year, the firm predicted.

Developers are adding 5.5 million square feet of offices in the next two years, on top of the 2 million introduced this year. Because of that, and because 5 million square feet of leases will be expiring during that period, the firm foresees a whole new round of price cutting and incentives by building owners.

"1985 has been a year for very creative deal making. We have all gotten hooked on the latest game show — Let's Make a Deal," said Monica Finnegan, a sales consultant for Coldwell Banker.

Rents in "Class A," or premium, buildings could fall as low as \$24 a square foot a year in 1986, down

from an average \$27 to \$28 per square foot this year, Finnegan said.

Since 1983, she said, the annual cost of premium space has dropped \$1 a square foot each quarter and Finnegan said they haven't been that low in at least five years.

Just four years ago, with office vacancies in San Francisco at 0.1 percent, rents soared to an all-time high of \$38 to \$45 a square foot.

But Finnegan said the drop in rents has provided some good news. With the gap between city and suburban rents vanishing, the exodus of San Francisco companies to the suburbs should slow "dramatically" next year.

Although San Francisco's office vacancies are higher than they've ever been, the city is not as overbuilt as other areas.

Oakland and the East Bay had one of the highest vacancy rates in the country at 24 percent, the same as Denver and Miami. The vacancy rate in New Orleans was estimated at 23 percent with Phoenix at 21 percent.

Nationwide, the downtown vacancy rate stood at 16.5 percent in September and the suburban rate

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S.F.'s Office Vacancy Rate at 8.2%

10-29-85 CHRON

The Bay Area continues to provide mixed signals in office vacancy rates, according to a survey by Grubb & Ellis. While San Francisco ranks as having the second lowest vacancy rate in the nation, San Jose is second highest, the survey showed.

Overall, Grubb & Ellis said the

boom in office building construction is showing signs of slowing down, with a 16 percent vacancy rate nationwide.

Traditionally overbuilt markets like Houston and San Diego are seeing a pick-up in leasing activity, dropping vacancy levels to 17 percent and 25 percent, respectively, according to the survey. These still

rank as among the nation's highest.

The Grubb & Ellis survey shows San Antonio with the highest vacancy rate at 32 percent, followed closely by San Jose at 30 percent.

Honolulu, at 8 percent, is the lowest of the major markets surveyed. San Francisco is next, at 8.2 percent. (New York City is not surveyed.)

Charles Froland, director of research for Grubb & Ellis, said "The current glut promises to be with us for some time."

S.F. office leasing looking up

More firms resettle in The City — PG&E leads the way

By Bruce Koon
EXAMINER REAL ESTATE EDITOR

Brokers and developers say major corporate tenants are stepping up their plans to lease downtown San Francisco office space to take advantage of increasingly favorable rents and other incentives being offered by building owners.

Such inducements led PG&E to change its mind about moving 3,000 employees to Concord. The company said yesterday it plans to lease 800,000 square feet of downtown office space to house the accounts, engineering and financial operations that were to have been shifted to the suburb.

Experts say PG&E won't be the only major corporation to rent new space downtown.

"Major tenants are looking at their future needs and are accelerating their plans," said John Culver, senior vice president, Northern California, Tishman West Management Corp. "There has been a noticeable acceleration in the last two or three months, and I suspect you will see quite a bit more in the next three to six months."

"We're seeing a lot more companies out there looking at space earlier than they normally would," said Brian Gleason, a sales consultant with Grubb & Ellis Commercial Services Co.

Both Gleason and Culver said they were aware of as many as 15 major companies — those that need at least 50,000 square feet — looking for space. They declined to identify the companies because of the competition among brokers to strike leasing deals.

Gleason said, however, "They're doing more than shopping. Some of them have leases coming due soon."

Ken Sproul of the Rubicon Group said law firms were active in the search. Banks, insurance companies and other financial services firms were also mentioned by brokers as being in the marketplace.

Brokers attribute the leasing activity to the soft office market. Estimates

of vacancy and absorption rates — the rate at which space is leased compared with the amount becoming available — can vary widely for the Financial District. But several real-estate brokerage firms put the vacancy rate at 10 to 11 percent and the true absorption rate (sublease space isn't included) at about 9 percent.

"Companies are concerned that in a couple of years the absorption rate will be down to 5 or 6 percent," Gleason said. That would put upward pressure on rents.

Commercial office rents also can vary widely in the downtown area, depending on the location and

— Please see LEASING, C-8

C-8 Tuesday, October 8, 1985 ★

LEASING

— From C-1

building. But brokers say rents generally go from the low \$20-a-square-foot range to the high \$30s. "There is an awful lot of space at the \$26-to-\$28 range," said Sproul. "Prime space should go for \$30 to \$34."

Carol Gilbert, vice president, Rubloff Commercial Brokerage, said more than 2.2 million square feet has been leased in San Francisco's major business areas as of Sept. 26. Her survey includes the Financial District, the northern waterfront, the Van Ness Avenue corridor and South of Market.

That tops the 1.9 million square feet of space leased for all of last year and the 2 million square feet leased in 1983, according to Gilbert.

The increased leasing activity doesn't mean the vacancy rate will be falling any time soon, however. Much of the leasing activity involves companies trading space in one building for another, improv-

ing on rent, location or amenities but not expanding tremendously.

"People aren't taking the large chunks of space they did before," said Gleason of Grubb & Ellis, citing concerns about the economy.

There is also as much as 9 million square feet of office space coming on the market in the next 14 months, according to Bill Cumbulic of Coldwell Banker Commercial Services Co. That includes space being vacated, sublease space and new construction.

"It's a misstatement that the market is in a boom period for growth. It's looking more attractive than a year ago, but it's not a boom period," Cumbulic said.

Nonetheless, brokers said the PG&E decision to lease in San Francisco is a boost to the San Francisco market. The deal would be the largest amount leased by single company this year. The space being rented dwarfs Del Monte's plans to lease 104,000 square feet at 160 Spear St. — previously one of the year's largest leasing deals.

PG&E said a long-term financial

analysis showed it would save about \$7 million a year by renting rather than building in Concord.

The company plans to relocate 2,500 to 3,000 people now in seven San Francisco buildings to the three leased buildings.

PG&E has 7,500 to 8,000 employees, contractors and temporary workers in San Francisco. About 5,000 of them are in the three buildings PG&E owns: 77 Beale St., 215 Market St. and 245 Market St.

The company declined to reveal its exact rental plans and said it is negotiating the 20-year leases with the real estate firm of Milton Meyer & Co.

A spokesman for Milton Meyer, which is owned by prominent San Francisco developer Walter Shorenstein, said PG&E was seeking space in two of its buildings, but he declined to identify them.

The two Shorenstein office buildings closest to PG&E's headquarters are: 5 Fremont Center and a new 26-floor building, 123 Mission St. The Mission Street building will

have about 300,000 square feet for rent.

Some 450,000 square feet of space held by Sohio Petroleum Co. may be available in 5 Fremont Plaza, one local real estate broker said. Sohio is scheduled to finish moving out of the building this month, he said, and will sublease the space.

Sohio has been cutting back its work force in San Francisco since last year, and in July said it was closing its San Francisco and Denver offices.

PG&E said it does not yet know what it will do with the Concord parcel, which is bounded by Oak, Laguna and Galindo streets, and the Concord BART station. The company declined to disclose the price it paid for the property.

PG&E had estimated that the complex would contain as much as 1 million square feet of office space and that it would have cost at least \$100 million.

San Francisco leasing appears headed for record year

Continued from page 1

increasing. Many of the moves involve existing tenant moving from one space to another, leaving the previous location vacant. "It's not growth in and of itself, it's relocation," says David Cumming, marketing director at Lincoln Property Co., who welcomes the wave of activity.

Net absorption is still low, adds Jim Moore, senior vice president and branch manager with Cushman & Wakefield. In fact, the net effect is a break-even situation, says Kenneth Sprout, a partner in The Rubicon Group, a San Francisco real estate brokerage firm.

Although the high level of leasing activity is good news for tenants and commercial brokers, apparently landlords aren't yet feeling any relief.

Several large employers are just beginning their moves out of the city, leaving substantial amounts of space behind to sublease, while office construction continues at a fast pace. The Rubicon Group estimates that nearly 9 million square feet of office space is vacant or will be vacated or built within the next 18 months.



Office leasing in San Francisco is on target for record year

Observers are noting intense competition among landlords to attract prime tenants, many of whom are being offered above-standard improvement allowances, free rent or other concessions.

The actual size of the office space surplus is tricky to gauge. Estimates on vacancy rates vary dramatically. The Building Owners and

Managers Association of San Francisco, for example, sets vacancy rates in the city at 8 percent to 10 percent, while Fuller Commercial Brokerage Co. logs it at 15.6 percent. Survey figures depend on geographical areas studied and which buildings are selected.

Regardless of the actual numbers, many tenants are finding space much more available than it was a few years ago. They say they are now able to plan for future growth.

"We're a new firm and we're about to do some serious growing," says Jeffrey R. Williams, partner in the law firm of Morgenstein, Ladd & Juhelirer, a San Francisco-based law firm that recently moved from a 3,500-square-foot space at 255 California St. to 5,200 square feet at 101 Market St. "We needed room to flex our muscles," he says.

In fact, the current office market is allowing them to consider even further expansion. The firm plans to exercise an option to lease an additional 3,000 square feet in the building.

The office vacancy rate also opened expansion possibilities for KFOG Radio, a subsidiary of Susquehanna Broadcasting Co., of York, Pa. Engineering manager Bill Ruck says the move wasn't easy, however, due to the station's unusual electronic and space needs. He says he found only eight suitable sites in the city, further limiting his flexibility.

He acknowledges that the market has softened, but he doesn't think prices have dropped substantially.

"Our parent company was in dramatic sticker shock throughout the process," Ruck says. "Our vice president came out here and just shook his head. This is an expensive town to do business in."

The leasing activity means money in the bank for the city's commercial brokers. According to Kenneth Sprout of The Rubicon Group, two million square feet of office space may mean \$10 million to \$12 million in commissions, spread among an estimated 250 commercial brokers.

"Most firms are quite busy," Sprout says. "There's a lot of activity out there."

That doesn't mean that everyone is profiting, however. The number of commercial brokers in the city has risen markedly in the past five years. Gilbert estimates there are 220 leasing agents in the city now, compared with about 160 in 1983. Many were attracted to the San Francisco real estate industry by the overheated market in the late 1970s and early 1980s.

In fact, the competition has recently become so tough that some brokers may be leaving the business. "Whether there will be this many (brokers) four years from now is an interesting speculation," Moore says.

"This is separating the men from the boys," says William Cumberlich, a senior leasing specialist with Coldwell Banker. "The transactions are harder and the money is harder to make."

Despite the competition, Cumberlich says, the prospects for brokers — and tenants — are better in today's market than they are for landlords.

WEEK OF AUGUST 19, 1985 • 75 CENTS

Office leasing showing dramatic surge

By Kirstin E. Downey

San Francisco appears headed for a record-breaking year in office leasing, according to Carol Gilbert, vice president of Rubloff Commercial Brokerage.

Gilbert, who has studied the city leases since Jan. 1, reports that at least 2 million square feet of office space have been leased in the city within the past seven months.

And she sees no end to the boom. San Francisco tenants are also apparently scrambling to take advantage of the plentiful supply of office space and good terms available.

"1985 represents the most active leasing market San Francisco has ever experi-

enced," Gilbert says. "Tenants recognize the enormous opportunity a market like this represents for them."

She says this higher than normal tenant interest translates into high leasing activity. "Everybody's making leases and lots of them," she explains. "There's a kind of momentum that gets started."

In the years since 1979, net absorption in the city has averaged 1.4 to 1.6 million square feet a year. Market activity was easier to measure from 1979 to 1981 because vacancy rates were so low and in 1982 because few deals were made.

According to Gilbert's figures, approximately 1.8 million square feet have already been leased in San Francisco this year. Some of the larger transactions include 151,000

square feet to the California Department of Transportation at 3333 California St., 40,000 square feet to Xerox Corp. at 201 Spear St., 60,000 square feet to accounting firm Arthur Young at One Sansome St. and 43,000 square feet to the Internal Revenue Service at Van Ness Plaza.

These transactions, although dwarfed by the mammoth deals that took place in 1979, 1980 and 1981, still add up to a hefty total. Gilbert concedes that her figures may not be complete or absolutely accurate because full details on private transactions are often unavailable.

Gilbert and other industry observers are quick to point out that high leasing activity doesn't mean that total market absorption is

please see page 10

PG&E says it may stay in City — rent's down

By Dexter Waugh
OF THE EXAMINER STAFF

Increasing vacancy rates and declining rents for office space in downtown San Francisco have caused PG&E to reconsider a move to Concord, where it had planned to build a \$100 million complex.

PG&E's reassessment is the first indication of a pause in industry's flight to the suburbs.

"I think certainly it's going to slow down now," said Bill Waterhouse, director of Concord's Redevelopment Agency, which owns half of the land where PG&E is thinking of building.

"Development is not going to be as rapid as in the past, but I think it will continue at a more stable pace."

Dick Draeger, a PG&E vice president, told the Concord City Council last night that the utility is reassessing its plans to build 1 million square feet of offices near the Concord Bay Area Rapid Transit District station.

Draeger said rents in downtown San Francisco have declined 15 percent in the last year, making them competitive with rates in Contra Costa County.

"The office market in San Fran-

— Please see OFFICE A-12

OFFICE

— From A-1

cisco is fairly dynamic right now," Draeger said today.

"We felt it would be prudent to take a very careful look. It's much more competitive than it was. Landlords seem more willing to offer long-term leases at reasonable rates."

PG&E owns a three-building, million-square-foot complex in downtown San Francisco. It rents another 450,000 square feet, Draeger said.

PG&E secured exclusive negotiating rights last January with the Concord Redevelopment Agency, which

owns half of the 5.5-acre parcel on which PG&E was considering building.

In a progress report to the Concord City Council — sitting as the Redevelopment Agency — Draeger said last night a financial study is still in the works. He said he hoped to report back in the fall.

Bill Waterhouse, Redevelopment Agency director, said the reconsideration was "not a surprise to us at all."

"Certainly, we'll have a slowdown in office development, since we've had a great rush in development in the last two years. We rather figured this was going to happen."

San Francisco's downtown office vacancy rate has been steadily in-

creasing, according to the office vacancy index compiled by commercial real estate firm Coldwell Banker. At the end of June it stood at 11.8 percent, up from 10.9 percent in March, 5.9 percent in March 1983 and 0.1 percent in March 1981.

A realty source said that vacancy rate amounts to 3.1 million square feet out of 28.5 million square feet in the competitive market. "When you have as much vacancy as we do now, there is going to be a softening of rents," he said.

He said a further increase in the vacancy rate is anticipated, mainly because there is another 4.5 million feet under construction.

Pacific Telephone and Bank of

America are also moving offices to San Ramon and Concord. Bank of America is planning to move into its new 1.1 million-square-foot complex in Concord.

Waterhouse said he did not know the impact of PG&E's reassessment and reconsideration.

He said he knows of no other planned projects that are being put on hold.

"I still get a steady flow of developers coming in, looking for development opportunities. But it's rather interesting that nowadays I get more developers looking either for residential housing development or retail, rather than office, which I think is healthy."

Employee relocation on the increase

EXAMINER STAFF REPORT

The level of employee relocation nationally increased 15 percent during May, the third straight month in which increases have been reported, according to RELO/Inter-City Relocation Service. And the average home price transferred workers paid rose, too.

In addition, figures reported by the Chicago-based RELO Service net-work from its members for the combined months of March, April and May indicate that activity among transferees increased 8 percent from a similar three-month period in 1984.

While transferee activity has been on the increase, figures from the RELO Service also indicate a rise in the average sales price of single-family homes sold to transferees during the this three-month period.

The average price during the most recent three-month period was \$103,375, up 8 percent over the corresponding three months last year.

The RELO Service, however, notes that the average price of a

home purchased by a transferee tends to be higher than the price paid for a residence by other segments of the buying public. Some of the reasons cited for the higher prices are that transferring individuals tend to be middle to upper management individuals, with generally higher incomes and equity positions, who can afford larger down payments. An increasing number of transferees have a working spouse, the RELO Service added.

Data from the RELO Service indicates a boom of transferee activity into a number of major metropolitan areas.

In Charlotte, N.C., for example, planned transfers into the market (those expecting to relocate during the summer months) during March, April and May were up 63 percent over a similar three-month period in 1984.

The Charlotte area currently is enjoying a very high level of transferee activity, particularly with the relocation of the corporate headquarters office of Royal Insurance Co. from New York expected to be

completed by spring 1986, says Gracy, director of corporate services of Real Estate One-Touchberry, a RELO-member company.

Other areas showing increased interest for transferees include Albuquerque, Atlanta, Dallas, Los Angeles, Boston and Miami.

"Boston is a very hot relocation market," says John Reardon, vice chairman of the board of Jack Conway & Co. According to Reardon, total residential sales by the company were up 50 percent during the first five months of this year and increased 35 percent alone in May.

At the same time, the average price of a single family home sold to a transferee moving to Boston rose to \$118,710 during March, April and May, up 44 percent over the average price for the same home sold during the same three months in 1984.

On the other hand, figures from the RELO Service note that relocation activity in Austin, Texas, which has experienced a tremendous growth rate, has slowed with current home prices rising sharply over last year.

Employees on the move

Employees were transferred at a faster rate in May, and the average sales price of the new houses they bought increased, too. Here are the combined transfer activities for March, April and May compared to the like period a year earlier.

Market areas	Planned transfers into market	Avg. price (thousands)	Price change vs. 1984
Albuquerque	+21%	\$95.1	-3%
Atlanta	+15	121.6	+11
Austin	-51	127.7	+82
Baltimore	-7	109.9	+7
Boston	NC	118.7	+44
Charlotte	+63	116.4	+14
Columbia, SC	-22	91.5	+10
Dallas	+55	109.1	NC
Greenwich, CT	+30	219.0	+77
Los Angeles	+40	144.9	-7
Memphis	NC	108.6	-14
Miami	+16	83.0	-28
Milwaukee	-39	76.5	-6
Oakland	+42	185.6	+38
San Francisco	+21.6	189.7	+35
San Jose	+3.5	175.3	+18
Tampa	-6	95.7	-29
Washington, DC	NC	125.8	+3

NC: no change

Source: RELO/Inter-City Relocation Service

Examiner Chart

City fares well in office vacancy studies

In 1976 the amount of new office space added in the U.S. was 106 million square feet. In 1984 that figure had soared to a record-shattering 325 million.

The office space building binge, although declining in 1982-83, pushed the construction curve even higher last year as an additional 200 million square feet came on line.

As one of the top 20 major office markets in the nation, San Francisco has followed this national cycle, and yet amid this spiraling construction trend, it still had one of the most enviable occupancy rates in the nation during 1984.

According to a recently released study of office markets in 184 in the central business districts of 20 major metropolitan areas, only four cities nationwide had better vacancy rates than San Francisco.

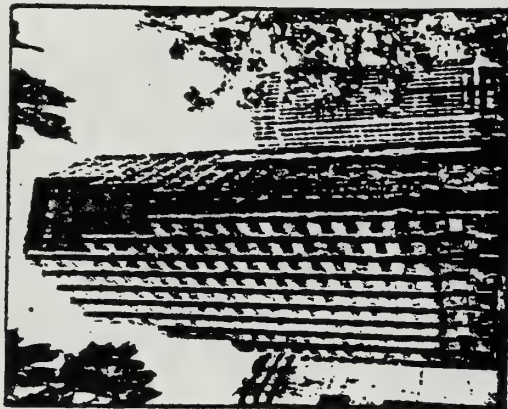
The report shows New York had a vacancy median of 7 percent, tied with Detroit, Philadelphia at 9 percent, Tampa at 9.5 percent and San Francisco at 10 percent. (More recent 1985 data shows San Francisco at 10.9 percent.)

The worst vacancy rate in the nation in 1984? Denver, Colorado — 24 percent.

In the jargon of commercial developers, the vacancy rate figures are basic to further data concerning space and time — the sponge of absorption.

The time span, or absorption period, needed to fill a certain amount of vacant office space gets detailed scrutiny each quarter.

Among the key findings of the study, conducted by the National Management Advisory



Within 16 months of opening, Lincoln Properties' 100 Spear Street highrise in the South of Market is 99 percent leased.

Services of Kenneth Leventhal and Company, were these concerning San Francisco:

In 1984 the time required to lease available office space at the City's annual absorption rate of 1.5 million square feet was a median period of 20 months.

By comparison, New York (the national leader) had an absorption rate of 5 million

square feet and required a period of 33.5 months to fill.

In the report's overall rating, Philadelphia's vacancy rate in 1984 was 9 percent, balanced against an absorption rate of 1,750,000 square feet in a time period of 16 months.

In the midst of increasing office space construction and against a backdrop of so many variable factors in office leasing, developers apply many strategies to decrease the time span of absorption.

For example, the Lincoln Property Company made its initial foray into the San Francisco market last year with its flagship project, the 100 Spear Street building, a 21-story structure South of Market.

It opened in January 1984 with approximately 10 percent of the 200,000 square feet pre-leased.

Within 16 months of the building's completion, Lincoln Property Company had leased 99 percent of the space, a significant track record of office leasing in the competitive San Francisco market.

Lincoln Property Company's David Cunningham points directly to one primary factor in the 100 Spear Street success. He said, "Working well with the brokerage community was our highest priority."

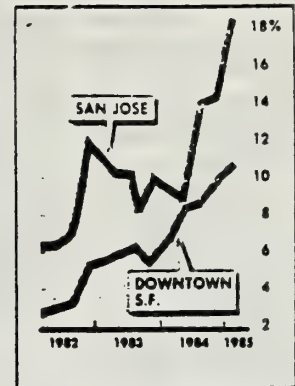
This same priority continues for Lincoln Property Company in its other San Francisco developments at the 19-story 33 New Montgomery Tower, a 10-story office building at 222 Kearny, as well as projects at 455 Market and 300 Beale Street.

Although a continuing healthy relationship between developers and the brokerage community is essential in the space time vacancy cycle, the demand for space, quality of development and the influence of tenants on lease agreements are strong currents in the flow of office space leasing efforts.

In a recent overview of the San Francisco office market for 1985, Norman A. Spence, associate vice-president of Coldwell Banker Commercial Real Estate Services, said "I believe we will continue to have a relatively soft market for office space in the next 12 to 24 months, and tenants will be able to strongly influence the economics of the lease transaction."

In light of this current sophistication of today's tenants, the significance of developer-broker relationships increases in importance to further reduce the office leasing absorption time in San Francisco.

OFFICE VACANCY RATES CLIMB



Good News For Office Renters in S.F.

SFC 5/22/85
By Stephen Maita

Office vacancies in downtown San Francisco have hit a 10-year high, prompting landlords to offer free rent, trips to Hawaii and other incentives to lure tenants.

Nearly 3 million square feet of downtown office space went wanting in March as the vacancy rate reached 10.9 percent, up from 6.9 percent a year ago, a new report by Coldwell Banker says.

Experts say the high vacancy rate is symptomatic of a glut of office space throughout the Bay Area and the nation, which has depressed rents by as much as 20 percent.

"The whole San Francisco office market is continuing to soften," said Clark Osterhout, regional manager for Charter Commercial Brokerage Co. "It's simply a matter of supply exceeding demand."

Although some San Francisco brokers expressed concern over the vacancy rate and scattered reports that it could continue to rise, others take consolation in even higher rates elsewhere.

"I don't see it as a panic situation at all," said Jim Moore, San Francisco branch manager of Cushman & Wakefield, a commercial brokerage. "Our vacancy rate is not a particular problem when you look at other cities."

Coldwell Banker found a 24.7 percent vacancy rate in downtown Denver, 21.7 percent in San Diego, 20.7 percent in Phoenix, 19.5 percent in Houston and 17.3 percent in Dallas.

After years when virtually no offices were available in San Francisco's downtown area, the vacancy

Good News for Renters of Offices in S.F.

By Stephen Maita
Rate started creeping up in 1982 as institutional and foreign investors pumped capital into office construction.

At the same time, high-rented companies, such as Chevron and Bank of America to shift some of their operations outside the city to less expensive areas, such as Contra Costa County.

Compounding the problem, developers have been scurrying to start office projects in recent years because of a fear that San Francisco may soon tighten building restrictions, such as adding new height limits.

Five huge projects totaling

nearly 2 million square feet of office space are scheduled to be completed in the next year to 18 months, Moore said.

They are 315 California St. with 570,000 square feet, 333 Bush St. with 420,000 square feet, 123 Mission St. with 300,000 square feet, 100 Montgomery St. with 200,000 square feet, and 300 Market St. with 225,000 square feet.

Vacancy rates are reaching record levels throughout the Bay Area and nation, including an 18.7 percent rate in downtown San Jose, 18 percent in Oakland, 20.3 percent in Sacramento and a 15.3 percent national average.

The surplus has dropped prices in San Francisco by up to \$4 a

square foot a year to the \$27-\$34 range, said Bill McCubbin, vice president and district manager for Greath & Ellis.

McCubbin said the drop has "narrowed the gap" between San Francisco rents and the East Bay suburbs, although rates still run at \$20 or under in many suburbs.

Besides, the initial effect on rates, experts say the glut could mean fewer office buildings will be proposed, financed and built.

For now, the market has simply forced developers to use their wits to move office space. That means discounting rents and paying tenants thousands of dollars in cash to decorate.

"In one case, a Fortune 500 company that signed for 35,000 square feet was given over a year's free rent plus tenant improvements," said Gregory M. Patton, vice president and regional manager of Coldwell Banker.

"That's really atypical, but almost everyone is cutting their rates and offering at least two or three months free rent for smaller tenants, and up to six months for large ones."

Osterhout said free trips to Hawaii aren't uncommon for long-term tenants, and one developer held a drawing for a trip to Europe to attract commercial brokers representing large companies.

Office renters enjoy high vacancy rates

—From Page A1

San Jose, Oakland and their suburbs.

• Office rents will be lowered everywhere.

• Developers will be less able to exert pressure to construct in overbuilt areas, so fewer office complexes will be approved.

• Public officials will be able to wield greater bargaining power in hitting down office projects.

• Public and private interests will be overbuilding, whether in the city's concrete canyons or on the outskirts of Alameda County.

• The job outlook will improve, if only because employers thrive on barriers in work space.

• On the other hand, there will be increased threats of a depressed, unhealthy development market.

Real estate broker Kenneth Sprout estimates that office rents are 25 percent to 40 percent below estimates of a year ago.

Sprout, a partner in the Rubicon Group, reports that on a 10-year lease today's climate, a landlord may offer such concessions as 15 to 18 months free rent and "above standard" allowances to a tenant with a good credit rating. He may even "cut a deal" to pay for part of such luxuries as marble floors, Sprout notes.

Bill Cumbelich, office building specialist at Coldwell Banker, suggests the rates mean more threatening economic times ahead for developers and landlords.

"Vacancy rates in San Francisco may be heading up to 16 percent next year," he predicts.

Jim Moore, manager of Cushman Wakefield here, goes a step further, noting that downtown San Francisco vacancies are headed toward 19 percent — what some real estate people call the "panic" level — in three years.

The reason? A mass exodus of jobs to suburban locations. "By early next year we're expecting a mass movement by the telephone company, the Bank of America and Chevron to suburbs" where rents are cheaper, Cumbelich notes.

With the departure of thousands of employees for new office parks like those in East Bay suburbs, Cumbelich estimates that 1.5 million to 2 million square feet of San Francisco offices will be empty.

Cumbelich calculates San Francisco downtown vacancies at 2.8 million square feet out of a total of 27.5 million square feet of non-government, non-owner-occupied buildings. For comparison, he says, downtown Los Angeles has about 2.9 million square feet of rentable offices.

Besides space occupied by departing corporate employees, Cumbelich sees greater increases in city vacancies coming as buildings under construction are completed. He estimates about 5.2 million square feet — the equivalent of about 17 average skyscrapers — of new office space will be completed in San Francisco by 1987.

Skyscrapers under construction in the city include, he notes, two extralarge structures, one at 345 California, another at 333 Bush St., 388 Market St., at 23 New Montgomery St., at 456 Montgomery St., at 77 Stevenson St., at 790 Battery and at 88 Kearny the San Francisco Federal Savings and Loan Tower.

With city landlords facing the problem of filling vast unrented space, Cumbelich foresees them dropping rents to suburban levels to remain competitive.

As corporations grab space in the suburbs, out-of-town rates are rising to city levels.

Sample rents today, Cumbelich notes: First-class space in the Financial District is running between \$26 and \$34 per square foot per year; between \$22 and \$28 in older, remodeled structures. In loft space, dubbed "tertiary space" by real estate people, rents run between \$15 and \$20.

Comparing San Francisco with Walnut Creek and downtown San Jose, Cumbelich sees differences starting in the premium category.

Walnut Creek's are now averaging around \$30 per square foot as are San Jose's, he says.

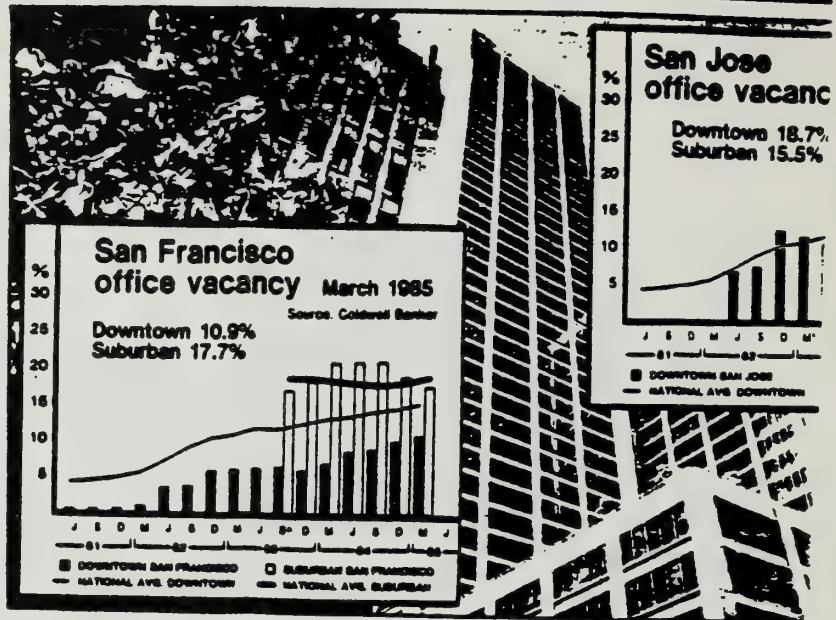
Oakland premium rents are averaging about \$25 per square foot, according to Jan Moore, office manager for Cushman Wakefield here.

In Concord, the level is about \$24. In Pleasanton about \$20, Cumbelich estimates.

High as local vacancy rates are, they are slight, Cumbelich notes, by comparison with those of Houston (19.5 percent in town; 26 percent in suburbs) or Denver (24.7 percent downtown; 24.1 percent in suburbs).

In Houston, Cumbelich estimates, about 31 million square feet of offices are empty in new downtown buildings.

San Francisco Planning Director Dean Macris says such percentages as high as those in Houston and Denver constitute "a depressed market. People regard these as unhealthy." He observed that from a business standpoint, "It takes years for a city to overcome their bad of image."



A renters' market for S.F. offices

By Gerald Adams 5/20/85

Examiner urban planning writer

Nearly 3 million square feet of office space is going begging for tenants in San Francisco, a record level that planners predict may double in the next three years as more high-rises are built downtown.

To lure tenants into empty offices, commercial landlords are offering free rent for up to a year and a half, free carpeting, drapes and partitions, and even marble floors.

Throughout the Bay Area, a glut of office space has pushed rents to levels 5 percent to 20 percent below those of a year ago, and as much as 25 percent to 40 percent below predicted levels.

Office vacancy rates have hit decade-high records, according to Coldwell Banker: 10.9 percent in downtown San Francisco; 18 percent in Oakland; 18.7 percent in downtown San Jose; 17.7 percent in Marin and San Mateo counties; and 22.7 percent in the Alameda-Contra Costa County suburbs.

A high vacancy rate means:

• Fewer office complexes will start construction in San

— See Page A16, col. 1

Report lists The City as hot commercial real estate market

Stripes Howard News Service
WASHINGTON — A new report says six of the 10 hottest commercial real estate markets in the country are in the West and three others are south of the Mason Dixon Line.

The only Northern city in the top 10 is Boston, as well as Edward Dale, a senior vice president of Coldwell Banker, the nation's largest commercial real estate company.

Dale told a meeting of real estate brokers and business leaders here Thursday that he considers Boston, Atlanta, Tampa, Dallas, Denver, Phoenix, San Jose, San Diego, San Francisco and Washington the hottest markets, followed closely by Chicago, Seattle and Portland, Ore.

If "vibrancy and potential" were the standard, he said, New York and Pittsburgh would have to be added to

the real estate industry is ready to "shake" the pattern of three good years and two bad ones. "The good times could last 10 to 15 years," he said.

His report was surprisingly upbeat in view of the high office vacancy rates in Houston, Denver, Dallas, Phoenix and many other metropolitan areas. But he argued that growing cities like Denver are able to absorb office space at an extremely rapid

Dale downplayed the much-publicized "glut" of office buildings in metropolitan areas. "The only city in the U.S. with a real oversupply of office space is Houston," he said, "and there we are looking at a 8 1/2-year supply downturn, and 7 years in the entire metropolitan area. So I am putting Houston on the temporarily disabled list."

Looking ahead, Dale said he thinks

office land in New York City is selling for \$2,000 a square foot, followed by Toronto and San Francisco at \$1,000 a square foot, Los Angeles at \$800 a square foot and Chicago at \$600 a square foot.

"Moreover, New York office rents are now the highest in the world, replacing London and Tokyo at the top of the list," he said.

Industrial land, usually found in the suburbs, has gone up nearly 1,000 percent in the past 10 years in San Diego and San Jose, 600 percent in Orange County, south of Los Angeles, and 500 percent in the Portland, Tri-Valley and Port Landerdale areas of Florida.

In a companion report, Coldwell Banker predicts that new housing starts and existing home sales will slip only slightly from their 1984 levels. The highest-priced major cities are San Francisco, where the average house cost \$163,000, and Washington and New York, where the average was about \$150,000 last year.

Atlanta and New York had those same problems in 1975," he said, "and Phoenix, San Diego and Tampa have the same overbuilt but absorbable situations today."

Dale noted that high vacancy rates have not done much to discourage new office projects.

"Office buildings are the premier trophy investment product today, and demand for them has never been stronger," he said. "Consequently, developers are building and planning many new projects in most of those cities, and just 37 and 38 will see enormous increases in supply."

Among high-technology cities, San Jose is "without question" No. 1 in commercial real estate activity, according to Dale's report, but Colorado Springs, Orlando, Fla., Austin, Texas, Sacramento and Portland, Ore., are not far behind. Colorado Springs and Austin have sold more than 1,000 acres to high-tech companies over the past four years, he said.

His report shows that downslows

Office Rents Fall, Vacancies Jump In Downtown S.F.

9/27/84
SFC.

By Harre W. Demoro

Office building rents have plummeted by 5 to 10 percent and a record 9 percent of downtown San Francisco office space is empty, Coldwell Banker Real Estate Services reported yesterday.

Although the situation probably won't improve for 18 months, it may lure companies to San Francisco that were scared away by the city's image as one of the most expensive in the country, said William J. Cumbelich of Coldwell Banker.

He blamed the trend on the rapid exodus of big companies to central Contra Costa County, the simultaneous completion of six large buildings in San Francisco that are currently competing for tenants, and a slowdown in the expansion of firms staying in the city that won't need more space.

The San Francisco-based companies shifting thousands of employees to Concord and San Ramon include Bank of America, Pacific Bell, Wells Fargo Bank and Chevron.

The new downtown buildings now seeking tenants or that are to be completed within a year include: the Citicorp highrise at Sansome and Market Streets, Bank of Canton at 555 Montgomery Street, 160 Spear Street, 456 Montgomery Street, 580 California Street, 655 Montgomery Street, 100 Spear Street, 201 Spear Street, 750 Battery Street, 345 California Street and the San Francisco Federal building at Kearny and Post streets.

The vacancy figure is the highest since Coldwell Banker began keeping the figure in 1978. From 1978-79, less than 2 percent of downtown space was empty. In 1980-81, the vacancy rate was less than 1 percent, the real estate firm said.

As the economy cooled off and several big buildings were finished, the rate rose to 4 percent in the second quarter of 1982 and to 8.5 percent in June 1984, according to Coldwell Banker.

Because of the surplus of space, premium space is leasing for \$27-\$38 a square foot annually and secondary buildings are renting for \$18-\$24 a square foot, 5 percent to 10 percent lower than a year ago, according to Cumbelich.

The high vacancy rate and declining rents should help San Francisco, he said. Firms scared off by high rents and a lack of space will consider the city. Companies already here but fearful of escalating rents will decide to stay, according to Cumbelich.

However, the restrictions the city plans to impose on downtown office building construction could slow construction so that space will be scarce again in about two years, driving rents back up, he said.

A Shadowy Market

6/11/84 SF Chronicle

Office-Space Bargains Abound

By Harre W. Demoro

Just when it appeared the downtown office market might shrink because new city controls allow landlords to boost rents rapidly, a real estate brokerage firm has compiled a list of little-known San Francisco space available at bargain rates.

According to a survey by Charter Commercial Brokerage Co., more than 475,000 square feet of sublease space, or 1.67 percent of the 28.5 million square feet in the inventory, is available below the usual rates in 188 buildings in the Financial District on both sides of Market Street.

That is as much space as in one high-rise tower in Embarcadero Center.

Real estate surveys often miss or ignore sublease space because it may be offered informally by a tenant who has moved out but is still paying rent and eager to make a quick deal, even at a loss.

"It is a shadowy, secondary market," said Bruce O. Carter, president of San Francisco-based Charter.

Of the 42.7 million square feet of office space in the entire city, 5.8 million square feet, or 13.57 percent, is vacant. About 698,500 square feet, or 1.64 percent of the total, is vacant sublease space, according to the Charter survey.

These numbers differ from the 7 percent downtown office vacancy rate that is generally accepted by major real estate brokers because the Charter study includes many more buildings than the other lists.

The sublease rent often is low because the former tenant took the space when rates were lower some years ago.

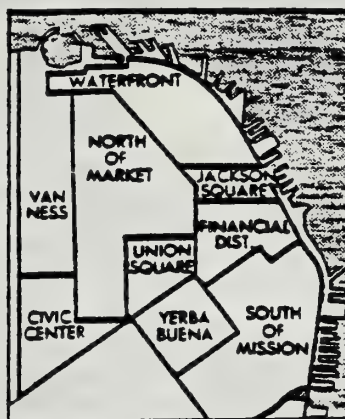
Another reason rates are low is because the space already has been improved and a tenant would have to adapt to designs already in place.

"You have a piece of space and that's it. You don't have flexibility," said Clark N. Osterhout, Charter regional manager.

In many cases, subleasing prices cannot be easily documented because of the way the arrangements are structured.

Landlords usually don't like subleasing because the original tenant can sublease the space at a higher price than he or she is paying the building owner. However, some of the newer original leases

MISSING OFFICE SPACE



Following is San Francisco's office vacancy rate by area and type of lease as of April 15, 1984:

	Direct lease	Sub-lease	All space
Financial District	8.95%	1.67%	10.62%
South of Mission	28.07	1.21	29.28
Civic Center	8.74	1.03	9.77
Jackson Square	19.84	2.31	22.15
Waterfront/N. Beach	19.59	0.25	19.84
Union Square	14.09	3.10	17.19
Yerba Buena	16.78	2.09	18.88
Van Ness	10.73	—	10.73
North of Market	6.51	1.17	7.68
TOTAL	11.94	1.64	13.57

Source: Charter Commercial Brokerage Co.

contain clauses that allow the landlord to share in profits from a sublease.

Some of the most prestigious addresses have vast amounts of vacant sublease space. Often this can be rented at 10 percent below the amount a landlord is getting for other space in the same building, Osterhout said.

Embarcadero Center 2 has often been cited as a classic example of the shadow market because significant amounts of space were subleased when Levi Strauss & Co. moved to its new Levi's Plaza headquarters before the old lease expired.

On the other hand, some prestige buildings, such as the Transamerica Pyra-

mid and the Bank of America headquarters, almost never have vacant space of any kind and rarely, if ever, are on a sublease list, according to Osterhout.

Here are some other sublease examples from Charter:

■ United States Leasing International is moving July 1 from 45,000 square feet at 633 Battery Street into 110,000 square feet at 220 Pacific Avenue. Space in the Battery Street building is usually available on a direct lease from the landlord in the \$22 to \$24 per square foot range annually. But U.S. Leasing will sublet it at \$18 per square foot until September 30, 1988, and there is an option to renew at market rates.

■ Almost 10 percent, or 125,000 square feet, of the 1.3-million-square-foot 101 California Street, the glassy building completed recently by Texas developer Gerald Hines, is available on a sublease basis. The landlord is getting \$42 per square foot annually on a direct lease.

■ The 700,000-square-foot 80 California Street tower has 44,000 square feet on the sublease market.

■ About 35,000 square feet in the 220,000-square-foot 801 California Street building is available as a sublease.

■ Brokers are offering 42,425 square feet of sublease space in the 380,000-square-foot 100 Pine Street tower.

Office space represents about 10 percent to 15 percent of the cost of doing business, according to Carter.

That is not a big enough percentage to keep a company in office space that is too small or in the wrong location, he said. So a decision to move before a lease expires and to sublease what is left behind, even at a loss, is not unusual.

Sometimes the owner of a new building will lure a tenant by taking over his old space and subleasing it, Osterhout said.

An example is Equitec, which was trying to lease its big building near the Oakland-Alameda Coliseum.

"They wanted Sperry Rand to move out there," Osterhout said. "So they took over Sperry's lease obligation at Embarcadero 3 for 16 months at \$60,000 a month." Almost immediately Equitec subleased the Embarcadero space to American Telephone & Telegraph.

"The space was vacant for one month so it was a good deal for Equitec and Sperry Rand," Osterhout said.

Feinstein aims to woo business at Soviet talks

12/5/85
EXAM

By Paul Farhi
and Jayne Garrison
OF THE EXAMINER STAFF

Mayor Feinstein will travel to the Soviet Union next week to discuss trade and cultural exchanges with Soviet officials, but the trip may prove more fruitful in attracting U.S. businesses.

Feinstein, Senate Majority Leader Robert Dole and U.S. Commerce Secretary Malcolm Baldrige are among the dignitaries invited to address the U.S.-U.S.S.R. Trade and Economic Council, a non-government group holding its annual three-day meeting in Moscow beginning Monday.

During her 10-day journey, the mayor will also meet separately with the mayors of Moscow and Leningrad and the Soviet minister of culture to discuss economic and cultural ties, including a possible art exchange between the de Young Museum and Leningrad's Hermitage. Negotiations on a similar exchange broke off in 1980 after the Soviets invaded Afghanistan.

Feinstein said yesterday she will not suggest that the Soviets open offices here, although her address to the conference — titled "The Future of Trade Between California and the Soviet Union" — will suggest how to improve relations. She said the speech will focus on agriculture and technology.

The mayor said she will lobby some of the 300 U.S. business executives who will be in Moscow for the trade meeting.

She called the trip "an opportunity for me to meet with certain individuals on the American side who may be looking to move" business into The City. She had no specific targets.

She plans to distribute 50 binders describing "exciting sites for job-producing industry in San

Francisco" to the executives. Among the sites are the port and Mission Bay.

The conference has attracted at least 20 chief executive officers of U.S. companies, including representatives of petrochemical, energy, industrial machinery and consumer-goods firms.

Local companies sending representatives are Varian Associates, a Palo Alto high-tech firm, and San Francisco-based Levi Strauss & Co., whose denim jeans are popular in the Soviet Union. A representative of the San Francisco Chamber of Commerce will also attend.

"This is an exploratory trip," said Feinstein. "I don't want to prejudge it. I'm going to be promoting San Francisco in every way I can."

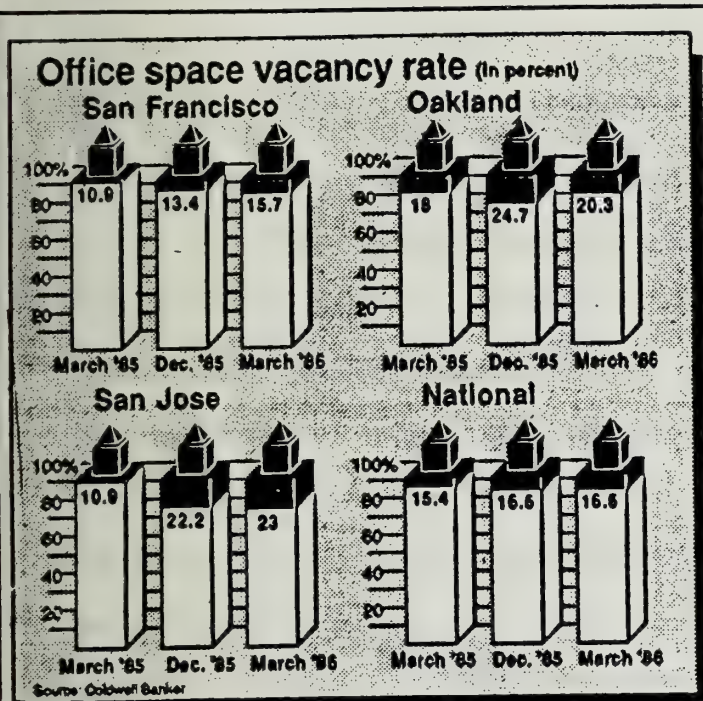
Attendance at the 12-year-old U.S.-Soviet conference has swelled this year following last month's Geneva summit meeting. Many executives say they are hopeful the summit will mean increased trade between the United States and the Soviet Union.

Trade totaled \$3.9 billion in 1984, with the United States exporting \$3.3 billion of goods, about \$2.8 billion in farm products. About the same level is expected this year.

Trade experts say the Soviets are interested in increasing their imports of U.S. industrial and high-tech equipment, but are blocked by a variety of security and economic restrictions.

The mayor said she did not know why she received the invitation to address the joint conference. But an aide speculated yesterday that the invitation grew out of The City's lengthy relationship with Moscow. San Francisco is the only U.S. city with a Soviet consulate.

Atlanta Mayor Andrew Young is the only other U.S. mayor addressing the conference.



More S.F. offices in need of tenants

By Tim Urbonya
OF THE EXAMINER STAFF

The office vacancy rate in San Francisco continued to climb during the first quarter of 1986 and now stands at 15.7 percent, according to a survey by Coldwell Banker.

The increase from 13.4 percent at the end of 1985 means that about 4.2 million square feet of the city's office stock of 27 million square feet stands vacant. A year ago, the vacancy rate stood at 10.9 percent.

The number of empty offices is likely to grow in coming quarters, said George Kallis, vice president and director of marketing for Coldwell Banker's Western office properties. Kallis called the first

quarter increase "minimal" compared with what is to come.

"It's not like it will be when we plug in those new buildings to be constructed in the future," he said.

More than 15 projects are scheduled to be completed this year, increasing the available square footage by 3.4 million. Another 855,000 square feet of office sublease space being vacated by BankAmerica Corp. also would contribute to the glut, Kallis said.

Despite the increase, Kallis said, The City remains below the national office-vacancy average of 16.5 percent. He said growth restrictions passed last year by the Board of Supervisors probably would slow office vacancy rates

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OFFICE

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over the long term.

San Francisco continues to have the smallest percentage of vacant downtown office space among major California cities.

Oakland's office vacancy rate declined during the first quarter to 20.3 percent from 24.7 percent in December, according to the Coldwell Banker survey. About 1.3 million square feet of office space remain vacant in Oakland.

Griffith H. Adams, vice president and resident manager of Coldwell Banker's Oakland office, attributed the decline to developers

becoming "more realistic" in their rent projections.

"What they came up with two or three years ago just isn't realistic in today's marketplace," he said. "They are making attractive deal to fill up their buildings. They are looking longer-term instead of short-term."

In San Jose, the vacancy rate rose 0.8 percent to 23 percent at the end of the first quarter. The city has about 1 million square feet of vacant office space, according to the survey.

Among major metropolitan markets, Denver had the highest vacancy rate at 26.1 percent, while Charlotte, N.C., had the lowest rate at 7 percent.

ATTACHMENT III: REVISED MEMORANDUM OF UNDERSTANDING

MEMORANDUM OF UNDERSTANDING

This Memorandum of Understanding is entered into this 3rd day of February, 1987 by and between the Mayor of the City and County of San Francisco (Mayor), Four Seas Investment Corporation (Developer), and the Citizens Advisory Committee on the International Hotel (Committee).

1. This Memorandum of Understanding is entered into by and between the parties relative to the construction by the Developer of certain improvements on two sites in the City and County of San Francisco. The International Hotel site is located at Kearny and Jackson Streets and will be referred to herein as the "I-Hotel Site." The second site is located at Columbus and Washington Streets and will be referred to herein as the "Columbus Site."

2. This Memorandum of Understanding supersedes that certain Memorandum of Understanding entered into between the parties on July 9, 1984.

3. Obligations of Developer Relative to I-Hotel Site.

A. Housing.

- i. Developer shall construct a residential tower of 8 floors above 3-1/2 levels of retail and 3-1/2 floors of underground parking on the I-Hotel Site. The building shall be no greater than 130 feet tall exclusive of utility requirements. The housing tower shall contain 126 residential units of which

91 shall be single units of at least 250 square feet and 35 shall be double units of at least 325 square feet. Each unit shall have self-contained kitchen and bathroom facilities and shall be metered individually for electricity.

- ii. a. Rents for the units described in paragraph i above shall not exceed \$1 per square foot and initial rents for single units shall not exceed \$225 per month. Rents shall be fixed at this level for a period of 5 years from initial occupancy of a unit. Thereafter, rent increases will be allowed at a rate equal to 80 percent of the annual Consumer Price Index (for all consumers in the San Francisco-Oakland metropolitan area as published by the Department of Labor). The rent structure described in this paragraph shall remain in effect for a period of 40 years. It is intended that vacant units in the development will be covered by the rental structure described above.
- b. Bonafide elderly and disabled tenants living in the International Hotel at

the time final eviction notice was served will be given first priority for occupancy in the housing project.

- (iii) The building constructed on the I-Hotel Site shall have 6,000 square feet of indoor community space at the base of the residential tower which will be provided by Developer for use by tenants and community service agencies. Developer shall provide for the maintenance and operation of the community space. The building shall also contain approximately 160 parking spaces on 3-1/2 underground levels.
- (iv) The City shall contribute \$3,000,000 towards the construction of the housing on the I-Hotel Site. Said \$3,000,000 shall consist of \$1,500,000 which has previously been allocated from the 1985-86 CDBG Program and \$1,500,000 which will be allocated from the Office Affordable Housing Production Program and the Community Development Block Grant Site Acquisition Fund. The Developer agrees that no other sources of City funds will be required or requested for the development and operation of this project except for the assistance provided pursuant to paragraph

5.B. The City shall use its best efforts to assist Developer in obtaining allocation of federal tax credits under the 1986 Tax Reform Act.

(v) The project shall be operated by a for-profit limited partnership with the general partner being either a nonprofit entity or a for-profit investor or management company.

B. Commercial.

The Developer shall build a structure on the I-Hotel Site containing a maximum of 3-1/2 floors of retail commercial space. This structure will contain a rooftop garden which shall be accessible to the tenants and will be maintained by Developer. The operation of the commercial project on the I-Hotel Site will be completely separate from the operation of the housing project.

4. Mixed Residential-Commercial Development

A. The Developer proposes to construct a commercial building on the Columbus Site, as described in the draft EIR for Pan Magna Plaza, 84.533E (published 3/14/86), as part of this mixed residential-commercial development. The commercial space proposed as part of this mixed development on both the I-Hotel and Columbus Sites is an integral financial inducement for the residential component of the development.

- B. It is understood by all parties that construction on the I-Hotel Site would commence and be at least substantially underway prior to commencement of construction on the Columbus Site.

5. Actions by Mayor.

- A. The Mayor shall recommend to the appropriate City boards, departments or agencies that \$1,500,000 from the Office Affordable Housing Production Program and the Community Development Block Grant Site Acquisition Fund be contributed to the project.
- B. The Mayor agrees to support the provision of any assistance necessary to assure that certain tenants described in 3.A.ii.b. pay no more than 30 percent of their income for rent. The City shall contribute no more than \$40,000 for this purpose.

6. Actions of the Committee.

- A. The Committee shall support the development of the project as set forth in this Memorandum of Understanding, and lend such assistance as is necessary to Developer and/or City to facilitate the development of the project.
- B. The Committee shall support the allocation of \$1,500,000 from the Office Affordable Housing Production Program and the Community Development Block Grant Site Acquisition Fund for use in the project.

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1 Ecker Bldg., Suite 200
San Francisco, CA 94105

Linda Wang
Mental Health Services
555 Polk St.
San Francisco, CA 94102

- L Ling-Chi Wang
Department of Ethnic Studies
University of California
Berkeley, CA 94720

Steven Weicker
899 Pine Street, #1610
San Francisco, CA 94108

Calvin Welch
Council of Community Housing
Organizations
409 Clayton Street
San Francisco, CA 94117

Howard Wexler
235 Montgomery, 27th floor
San Francisco, CA 94104

Eunice Willette
1323 Gilman Avenue
San Francisco, CA 94124

Alan Wong
Chinatown YMCA
855 Sacramento St.
San Francisco, CA 94108

Joana Woo
3230 Clay Street
San Francisco, CA 94115

Ernest Wu
Cameron House
920 Sacramento Street
San Francisco, CA 94105

Leslie Yee
1531 Powell Street
San Francisco, CA 94133

Joe Yuey, Owner
Imperial Palace
919 Grant Ave.
San Francisco, CA 94102

Bethea Wilson & Associates
Art in Architecture
2028 Scott, Suite 204
San Francisco, CA 94115

Marie Zeller
Whisler-Patri
P.O. Box 7054
San Francisco, CA 94120-7054

- Marty Zwick
George Miers & Associates
420 Sutter St.
San Francisco, CA 94108

ADJACENT PROPERTY OWNERS

208/30 to 35, 37 to 50, 53 to 59
Crow-Speiker #99
601 Montgomery St., Suite 410
San Francisco, CA 94111
Attn: Patrick Gilligan

XII. Distribution List

176/11
Golden Coin S & L Assoc.
835 Kearny St.
San Francisco, CA 94108

177/2
Der Yen & Franklin and Shee Quan
c/o Hogan & Vest Inc.
949 Stockton St.
San Francisco, CA 94108

194/1
Andre J. Pechoultres
c/o Pacific Realty Co.
2767 Octavia Street
San Francisco, CA 94123

194/2
Der Lee Tai Hun
c/o John J. Dito & Son
596 Pacific Ave.
San Francisco, CA 94133

194/3
Fung, Chu Quon & Virginia L.
1165 Washington Street
San Francisco, CA 94108

194/4
Yick Yack Yuen Chan Life Est.
827 Kearny St.
San Francisco, CA 94108

194/5
City Title Insurance Co.
c/o Buddhas University Foundation
720 Washington St.
San Francisco, CA 94108

195/1
735 Montgomery Building
c/o Maurice L. Rosano
430 Bay Shore Blvd.
San Francisco, CA 94124

195/2
Pyramid Investment Corp.
600 Montgomery St.
San Francisco, CA 94111

195/6
Ming & Pearl Hui
160 Valparaiso St.
San Francisco, CA 94111

195/9
William & Ann Breall
c/o California Realty & Land Inc.
1322 Grant Ave.
San Francisco, CA 94133

195/10
Fan Tec Development Corp.
c/o Charles Wu
15340 Mendocino St.
San Leandro, CA 94579

195/12
Fong NY Enterprise of California, Inc.
55 Columbus Ave.
San Francisco, CA 94111

195/14
Gordon, Guey & Cecilia Wong
549 Pennsylvania St.
San Francisco, CA 94107

195/17
Clown Alley, Inc.
42 Columbus Ave.
San Francisco, CA 94111

207/32
Transamerica Title Ins. Co.
Steven Pinkham
1150 S. Olive Street
Los Angeles, CA 90015

208/27, 28
Bank of America NT & SA Trust
c/o Trammell Crow Co.
2180 Sand Hill Road, #100
Menlo Park, CA 94025

196/8
Doros
c/o Milton Meyer & Co.
1 California St., #2900
San Francisco, CA 94111

196/10
Robert A. Bertini
c/o Bob Berig
708 Montgomery St.
San Francisco, CA 94111

XII. Distribution List

208/29
Arthur Campos and Mini Campos Trust
3500 Scott St.
San Francisco, CA 94123

208/36
Sung-Lam & Ling-Yee Chen
611 Washington St., #2108
San Francisco, CA 94111

208/51
Lee Hellerberg Family Trust
611 Washington St., #2402
San Francisco, CA 94111

208/52
Richard & Barbara Rosenberg
611 Washington St., #2405
San Francisco, CA 94111

208/60
Gary S. & Susann Atherton
611 Washington St., #2601
San Francisco, CA 94111

208/61
Robert & Audrey Sockolov
611 Washington St., #2602
San Francisco, CA 94111

Bernard & Barbro Osher
Unit 2403
611 Washington
San Francisco, CA 94111

Monroe Schneider
MSA
P. O. Box 2387
South San Francisco, CA 94083

Hedenberg
c/o David J. Barardo
1801 Century Park East, #730
Los Angeles, CA 90067

Michael & Carol Raleigh
P. O. Box 143
Sea Ranch, CA 95497

W. R. Spence
SRI WEST
P. O. Box 21536
Waco, TX 76702

Nan Tucker McEvoy
c/o Pat Brennan
1408 - 35th Street N. W.
Washington, D. C. 20007

Robert Varner
Varner Development Company
P. O. Box 877
Kentfield, CA 94913

Robert J. Silver
Unit 2105
611 Washington
San Francisco, CA 94111

Joy Morriss
Rupert Taylor Real Estate
1090 Ralston Avenue
Belmont, CA 94002

Richard Ralph
3600 Jackson
San Francisco, CA 94118

R. M. Hecker
Unit 2302
611 Washington
San Francisco, CA 94111

Mark Benson and
Sarah Marshall
Unit 2107
611 Washington
San Francisco, CA 94111

Henry & Judy Chan
P. O. Box 26189
San Francisco, CA 94126

Lou Mertes
Unit 2301
611 Washington
San Francisco, CA 94111

XII. Distribution List

Terry & Joan Bigham
Unit 2306
611 Washington
San Francisco, CA 94111

Theodore & Doris Lee
Unit 2204
611 Washington
San Francisco, CA 94111

John & Ona Roth
Unit 2504
611 Washington
San Francisco, CA 94111

Dolores Staudenraus
Unit 2305
611 Washington
San Francisco, CA 94111

Fred Braun
Unit 2109
611 Washington
San Francisco, CA 94111

MEDIA

East/West News
838 Grant Avenue, #302
San Francisco, CA 94108
Attn: Eunice Chen

San Francisco Bay Guardian
2700 - Nineteenth Street
San Francisco, CA 94110
Attn: Patrick Douglas, City Editor

San Francisco Business Journal
635 Sacramento Street, Suite 310
San Francisco, CA 94111
Attn: Kirstin E. Downey

San Francisco Chronicle
925 Mission Street
San Francisco, CA 94103
Attn: Evelyn Hsu

San Francisco Examiner
P.O. Box 7260
San Francisco, CA 94120
Attn: Gerald Adams

San Francisco Progress
851 Howard Street
San Francisco, CA 94103
Attn: E. Cahill Maloney

The Sun Reporter
1366 Turk Street
San Francisco, CA 94115

Tenderloin Times
146 Leavenworth Street
San Francisco, CA 94102
Attn: Rob Waters

Yu Yu
World Journal
824 Stockton St.
San Francisco, CA 94108

LIBRARIES

Cogswell College Library
600 Stockton Street
San Francisco, CA 94108

Document Library (3)
City Library - Civic Center
San Francisco, CA 94102
Attn: Faith Van Liere

Environmental Protection Agency Library
215 Fremont Street
San Francisco, CA 94105
Attn: Jean Circiello

Stanford University Libraries
Jonsson Library of Government Documents
State and Local Documents Division
Stanford, CA 94305

Government Publications Department
San Francisco State University
1630 Holloway Avenue
San Francisco, CA 94132

Hastings College of the Law - Library
200 McAllister Street
San Francisco, CA 94102-4978

Institute of Government Studies
1209 Moses Hall
University of California
Berkeley, CA 94720

● XIII. CERTIFICATION MOTION

File No.: 84.533EC
Pan Magna Plaza
Assessor's Block 195,
Lots 4, 5, 11 and 13

SAN FRANCISCO
CITY PLANNING COMMISSION
MOTION NO. 11040

ADOPTING FINDINGS RELATED TO THE CERTIFICATION OF A FINAL ENVIRONMENTAL IMPACT REPORT FOR A PROPOSED MIXED USE DEVELOPMENT WITH UNDERGROUND PARKING IN TWO BUILDINGS: ONE AT THE NORTHWEST CORNER OF MONTGOMERY STREET AND COLUMBUS AVENUE, ONE AT THE SOUTHEAST CORNER OF KEARNY AND JACKSON STREETS.

MOVED, That the San Francisco City Planning Commission (hereinafter "Commission") hereby CERTIFIES the Final Environmental Impact Report identified as case file No. 84.533EC, Pan Magna Plaza (hereinafter "Project") based upon the following findings:

1) The City and County of San Francisco, acting through the Department of City Planning (hereinafter "Department") fulfilled all procedural requirements of the California Environmental Quality Act (Cal. Pub. Res. Code Section 21000 et seq., hereinafter "CEQA"), the State CEQA Guidelines (Cal. Admin. Code Title 14, Section 15000 et. seq., (hereinafter "CEQA Guidelines") and Chapter 31 of the San Francisco Administrative Code (hereinafter "Chapter 31").

a. The Department determined that an EIR was required and provided public notice of that determination by publication in a newspaper of general circulation on July 5, 1985.

b. On March 14, 1986, the Department published the Draft Environmental Impact Report (hereinafter "DEIR") and provided public notice in a newspaper of general circulation of the availability of the DEIR for public review and comment and of the date and time of the City Planning Commission public hearing on the DEIR; this notice was mailed to the Department's list of persons requesting such notice.

c. Notices of availability of the DEIR and of the date and time of the public hearing were posted near the project site by Department staff on March 25, 1986.

d. On March 14, 1986 copies of the DEIR were mailed or otherwise delivered to a list of persons requesting it, to those noted on the distribution list in the DEIR, to adjacent property owners, and to government agencies, the latter both directly and through the State Clearinghouse.

e. Notice of Completion was filed with the State Secretary of Resources via the State Clearinghouse on March 14, 1986.

2) The Commission held a duly advertised public hearing on said Draft Environmental Impact Report on May 1, 1986 at which opportunity for public comment was given, and public comment was received on the DEIR. The period for written comments ended May 7, 1986.

APPENDICES

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DEPARTMENT OF CITY PLANNING 450 McALLISTER STREET • SAN FRANCISCO CALIFORNIA 94102

NOTICE THAT AN
ENVIRONMENTAL IMPACT REPORT
IS DETERMINED TO BE REQUIRED

Date of this Notice: July 5, 1985

Lead Agency: City and County of San Francisco, Department of City Planning
450 McAllister Street - 5th Floor, San Francisco, CA 94102

Agency Contact Person: Catherine Bauman Telephone: (415) 558-5261

Project Title: Pan Magna Plaza Project Project Sponsor: Four Seas Investment Corporati

Project Contact Person: Jack Johannes

Project Address: 1 - 45 Columbus Avenue and 824 - 860 Kearny

Assessor's Block(s) and Lot(s): 195/4,5, and 11, 13

City and County: San Francisco

Project Description: The project would include construction of two buildings on two separat sites: A 12-story office and residential structure, located at the southeastern corner of the intersection of Kearny and Jackson (A-Site) and an 11-story office building located at the northeastern corner of the Washington Street, Columbus Avenue and Montgomery Street intersection (B-Site). Both buildings would include ground floor retail.

THIS PROJECT MAY HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT AND AN ENVIRONMENTAL IMPACT REPORT IS REQUIRED. This determination is based upon the criteria of the Guidelines of the State Secretary for Resources, Sections 15063 (Initial Study), 15064 (Determining Significant Effect), and 15065 (Mandatory Findings of Significance), and the following reasons, as documented in the Environmental Evaluation (Initial Study) for the project, which is attached.

Deadline for Filing of an Appeal of this Determination to the City Planning Commission: July 15, 1985 5:00 p.m.

An appeal requires: 1) a letter specifying the grounds for the appeal, and;
2) a \$35.00 filing fee.

Barbara W. Sahm
BARBARA W. SAHM, Environmental Review Officer

PAN MAGNA PLAZA

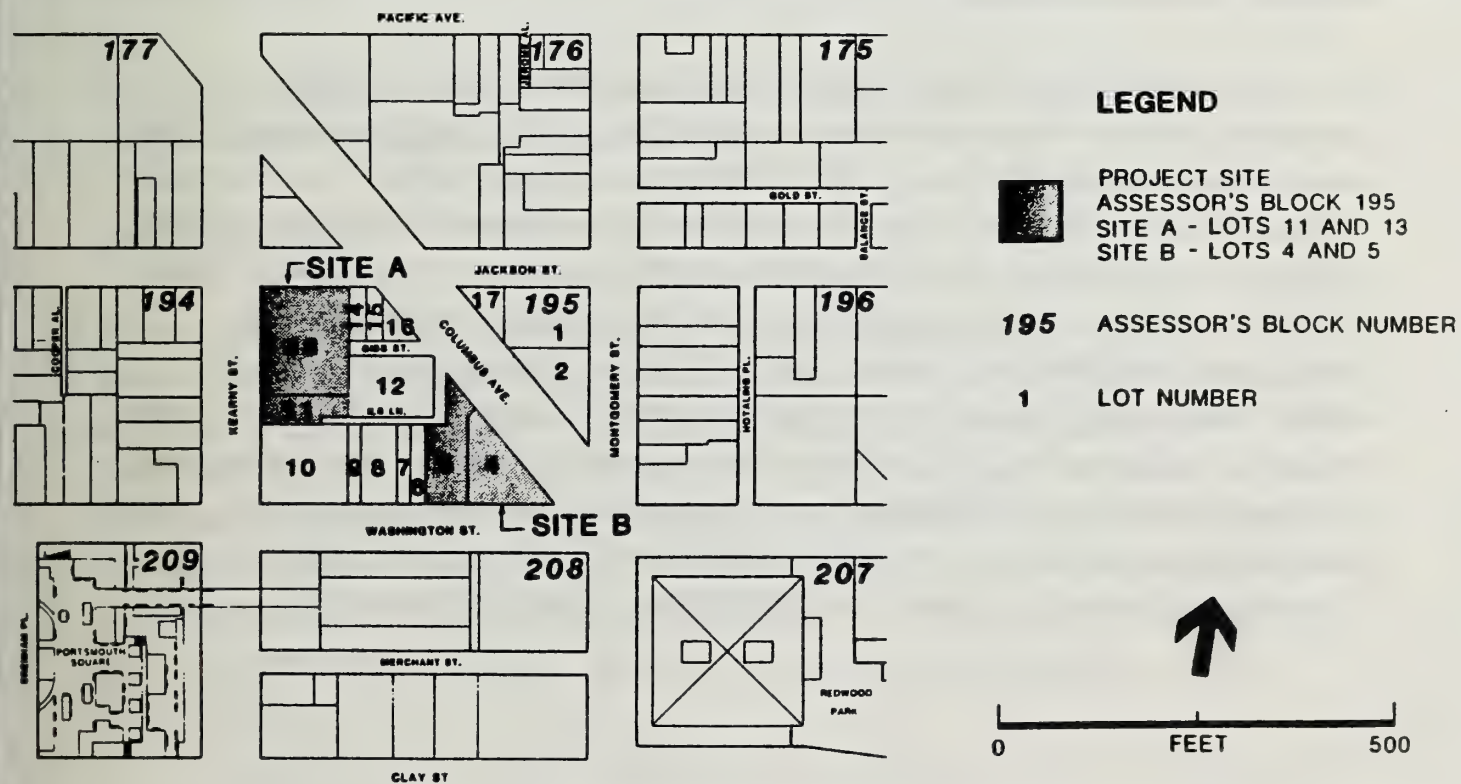
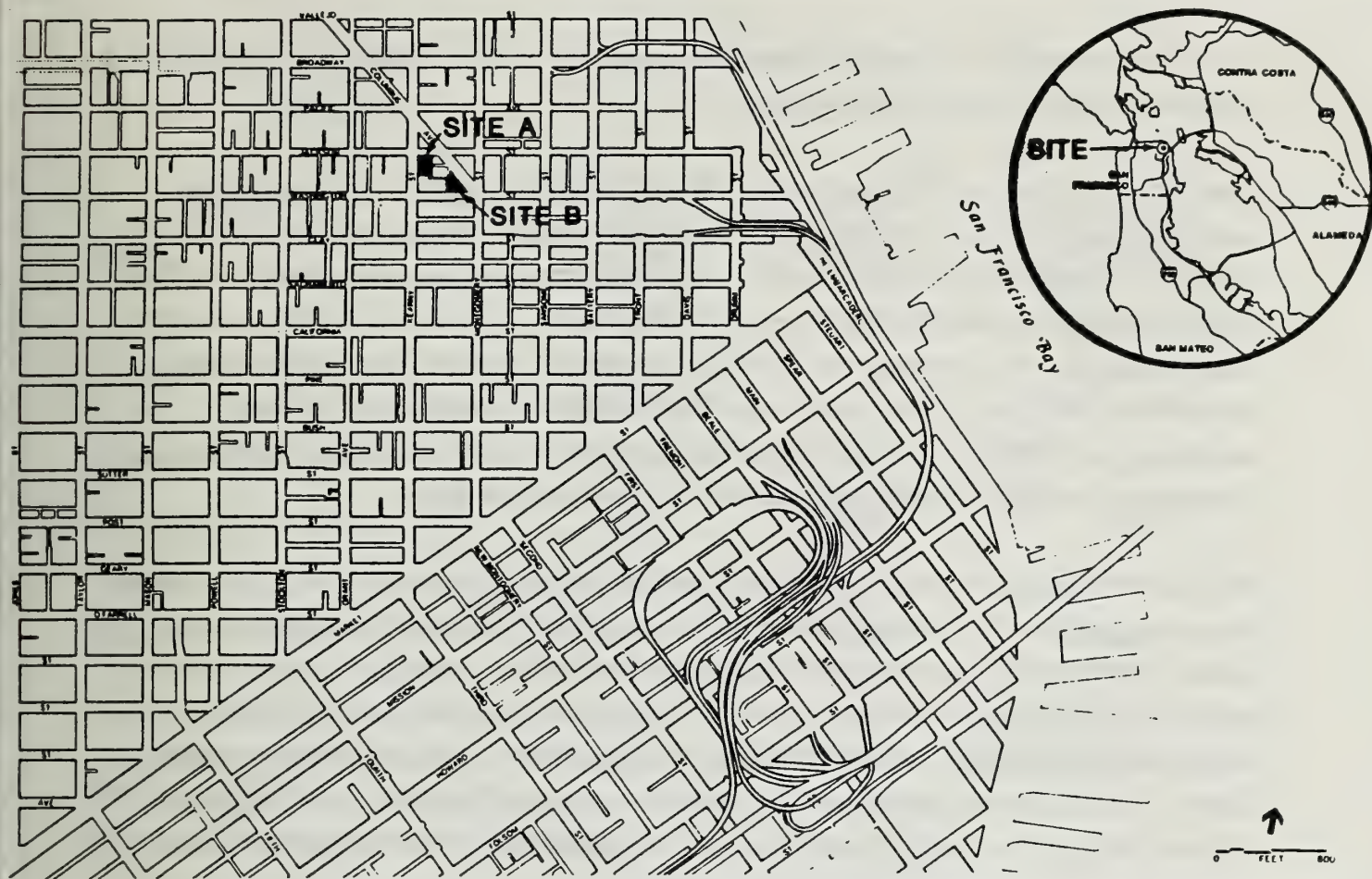
Initial Study

84.533E

I. PROJECT DESCRIPTION

The Pan Magna Plaza project would include construction of two buildings on two separate sites: A 12-story office and residential structure, (the residential portion of the building would be ten stories tall, with ground-floor retail, second level office and eight levels of low-income housing for the elderly); located at the southeastern corner of the intersection of Kearny and Jackson Streets ("A-Site"); and an 11-story office building (with ground floor retail) located at the northeastern corner of the intersection of Washington Street, Columbus Avenue and Montgomery Street ("B-Site"). Both sites are on Assessor's Block 195. A-Site consists of Lots 11 and 13 and B-Site consists of Lots 4 and 5 (see Figure 1, p. 2). The 18,920-sq.-ft. A-Site is currently vacant; the six-story International Hotel (I-Hotel) which previously occupied the site was demolished in 1979. The 14,060-sq.-ft. B-Site is occupied by the two-story, 8,000 sq. ft., Colombo Building with ground-floor retail and office above on Lot 4; Lot 5 is vacant. The structure and facade, but not the floors of the Colombo Building would be incorporated into the proposed project.

The two sites are in the Interim C-2-C (Community Business Chinatown) Use District; adopted by the City Planning Commission as Interim Controls January 10, 1985. The permanent underlying zoning is C-2 (Community Business). The Department of City Planning is currently studying new permanent zoning for Chinatown. The basic Floor Area Ratio (FAR) for the C-2-C District is 4.8 to 1. This FAR would not apply to the proposed project (in accordance with the Interim Controls -- Section 124.1(c)), because a portion of the project has received commitment for Community Development Block Grant (CDBG) funds as of January 10, 1985 for creation of new housing. The basic FAR for the project (both sites) is, as under the former zoning, 10:1 (in accordance with Section 124(c) of the Planning Code, since both sites are nearer to a C-3 District than to any R District). Under Sections 125(a) and 125(b) of the City Planning Code, both sites would be eligible for corner lot and interior lot premiums; the permitted FAR for both sites would be about



SOURCE: ESA

FIGURE 1
PAN MAGNA PLAZA
PROJECT LOCATION

12:1. The interim C-2-C controls require CU authorization for heights above 40 ft. This requirement would apply to the project.

Over 75% of A-Site (Lot 13) is in a 65-A Height and Bulk District, with a maximum permitted height of 65 ft. and maximum length and diagonal dimensions above 40 ft. in height of 110 and 125 ft., respectively. The proposed project includes a Height and Bulk District reclassification of this portion of A-Site to 65-D-2. Most of B-Site (except about 100 sq. ft. at Columbus Ave. and IIs Lane which is in the 65-A Height and Bulk District) and lot 11 of A-Site, are in a 65-D-2 Height and Bulk District. Height exceptions in the 65-D-2 District may be approved by the City Planning Commission as a Conditional Use (CU), in appropriate cases, up to a height of 200 ft.

The project is located in the Washington/Broadway Special Use District No. 1 and would thus not be required to provide parking for any use other than dwellings, since neither site exceeds 20,000 gsf. Twenty-eight parking spaces would be required for the 140 elderly housing units proposed on A-Site; 23 parking spaces are proposed on A-Site, and 31 spaces are proposed on B-Site. Five of these would be reserved for the use of A-Site residential tenants. Conditional Use authorization would be necessary for about 12 of the parking spaces on B-Site. No loading docks would be required by the Planning Code for either site; two would be provided on B-Site.

On A-Site, the 12-story office building would be about 156 ft. tall; the 10-story residential portion of the structure would be about 112 ft. tall. The structure on A-Site would contain about 89,700 gross sq. ft. of office space, 9,965 gross sq. ft. of retail space and about 18,900 gross sq. ft. of parking in the basement (23 spaces), with about 52,890 gross sq. ft. of residential space (140 units) and 6,320 gross sq. ft. of community rooms. The FAR on A-Site would be about 8:1 (including residential use in the floor area calculation). On B-Site, the 11-story office building would be about 152 ft. tall and contain about 97,090 gross sq. ft. of office space, about 8,335 gross sq. ft. of retail space, and about 11,900 gross sq. ft. of parking in the basement (31 spaces). Two loading docks would be accessible from Washington St. The FAR on B-Site would be about 7.5:1. Total gross square footage of floor area on both project sites is summarized in Table 1, p. 4. Elevations and ground floor plans of A- and B-Sites are shown in Figures 2 to 7, pp. 6 to 11.

TABLE 1: GROSS SQUARE FOOTAGE OF FLOOR AREA

<u>Use</u>	<u>A-Site</u>	<u>B-Site</u>	<u>Total Project</u>
Office	89,700	97,090 /a/	186,790 /a/
Retail	9,965	8,335 /a/	18,300 /a/
Residential	52,890 (140 units)	--	52,890 (140 units)
Community Rooms	6,326	--	6,320
Mechanical/Storage	5,890	3,070	8,960
Lobby	3,950	1,875	5,825
Parking	18,900 (23 spaces)	11,900 (31 spaces)	30,800 (54 spaces)

/a/ Includes existing Colombo Building (about 4,000 gross sq. ft. of office and 4,000 gross sq. ft. of retail).

SOURCE: Wong, Brocchini & Associates

The project sponsor is Four Seas Investment Corporation. The project architects are Wong, Brocchini & Associates of San Francisco.

History of A-Site/1/

Prior to 1979, the I-Hotel, a six-story, low-cost, long-term residential hotel with approximately 164 rooms, was located on the northern lot of A-Site. The I-Hotel was purchased by Four Seas Investment Corporation (the current project sponsor) on September 15, 1973. In July of 1976, the Human Rights Commission requested that the San Francisco Housing Authority (SFHA) preserve the I-Hotel for low-income housing. In October of 1976 the Housing Authority designated the site for low-income housing. On November 30, 1976, the Board of Supervisors adopted two resolutions, the first approving the I-Hotel site for approximately 150 units of low-income housing, and the second appropriating

\$1.3 million from CBDG funds for site acquisition. Former Mayor George Moscone intended that CDBG funds be used to purchase the I-Hotel for resale to the I-Hotel Tenants Association. In December of 1976, the SFHA offered to buy the I-Hotel; its offer was refused. The SFHA then secured a court order to take possession of the I-Hotel. Four Seas filed a legal challenge and the court ruled in its favor. I-Hotel tenants were evicted on August 4, 1977. The I-Hotel was demolished in 1979.

In October of 1979, Mayor Feinstein appointed a Citizens Advisory Committee for development of the I-Hotel Block. A Development Plan was prepared by the Department of City Planning and the Citizens Advisory Committee. The plan proposed 192 units, 6,900 sq. ft. of community space, 13,500 sq. ft. of open space and 250 to 280 parking spaces, for all of the vacant lots on this block along Kearny St., including the I-Hotel site (A-Site), and the Fan Tec site at the corner of Kearny and Washington Sts. (Lot 10, not a part of this project).

In April of 1982, interim zoning of the I-Hotel block from C-2 to RC-4, was approved by the Planning Commission and Board of Supervisors (this interim zoning was extended for six months in April of 1983, after which time it expired).

In September of 1984, the Mayor and Four Seas signed a "Memorandum of Understanding," whereby, Four Seas proposed a project with two 12-story office buildings and 140 residential units for the elderly, to which the Mayor agreed to commit \$1.5 million of CDBG funding. This project is proposed by Four Seas in response to that Memorandum.

NOTE - Project Description

/1/ International Hotel Chronology, Department of City Planning, dated March 9, 1984; this memorandum is available for public review at the Office of Environmental Review, 450 McAllister Street, San Francisco, California.

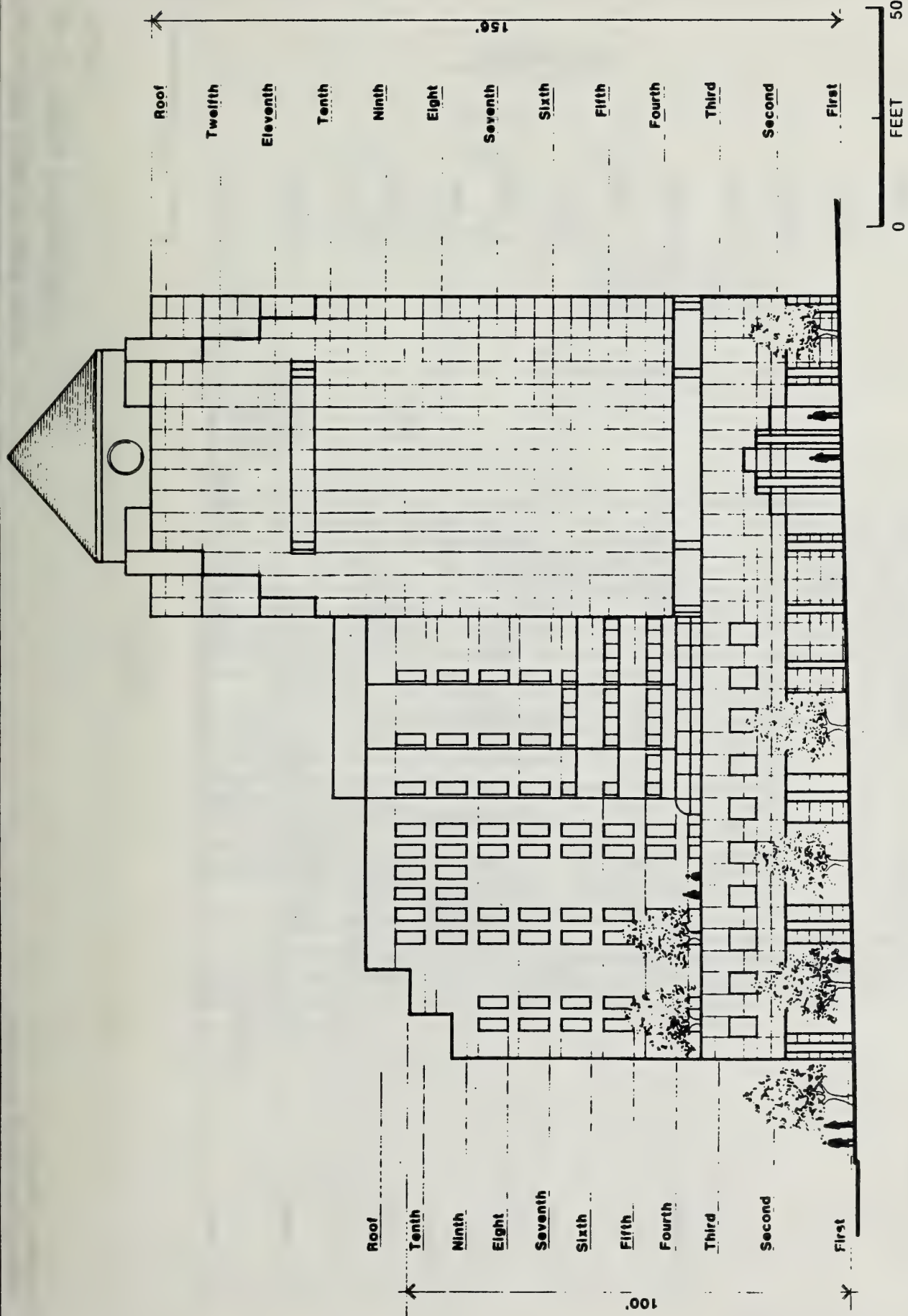


FIGURE 2
PAN MAGNA PLAZA A-SITE
KEARNY STREET ELEVATION

SOURCE: Worley K. Wong -
 Ronald G. Brocchini & Associates

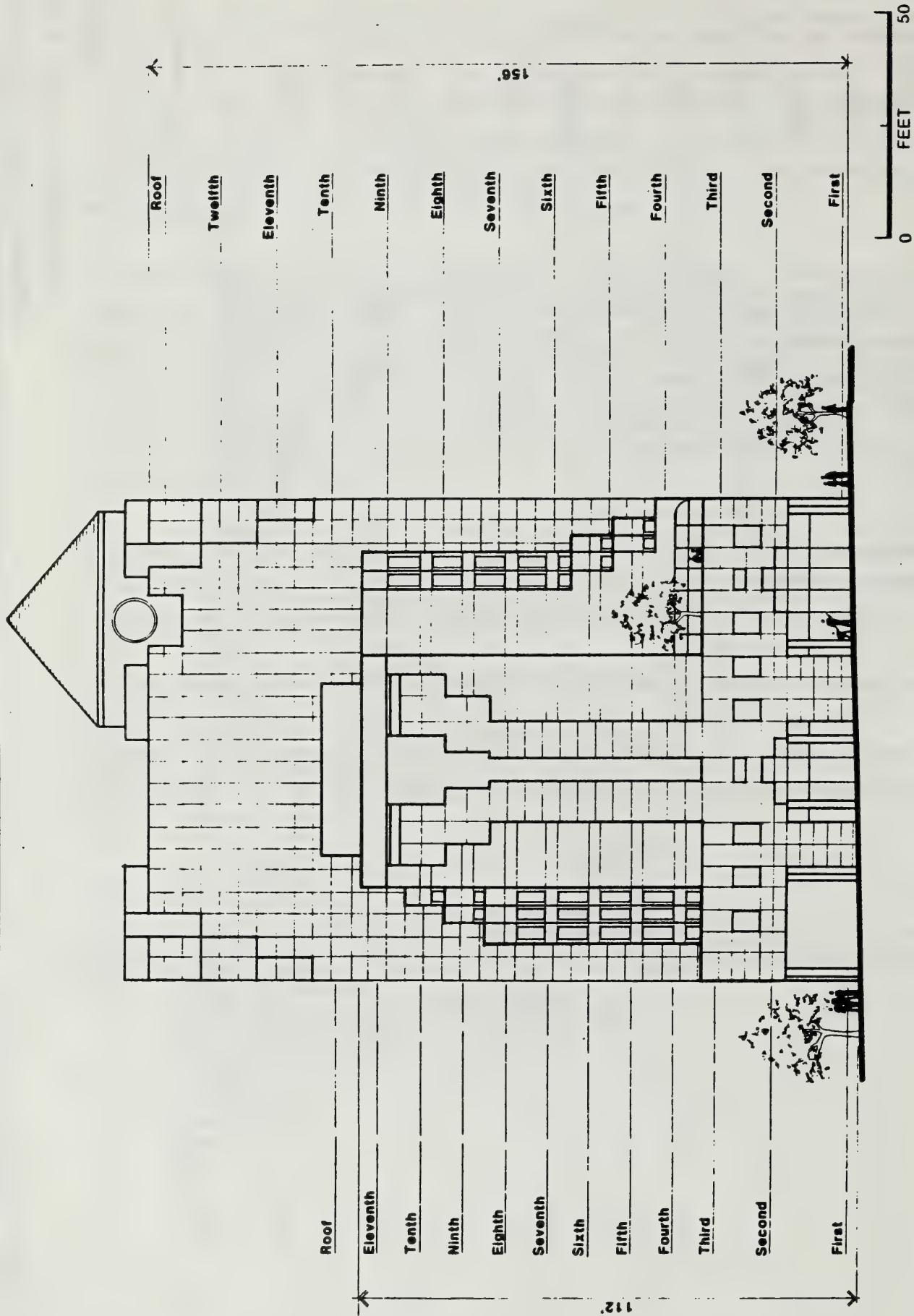
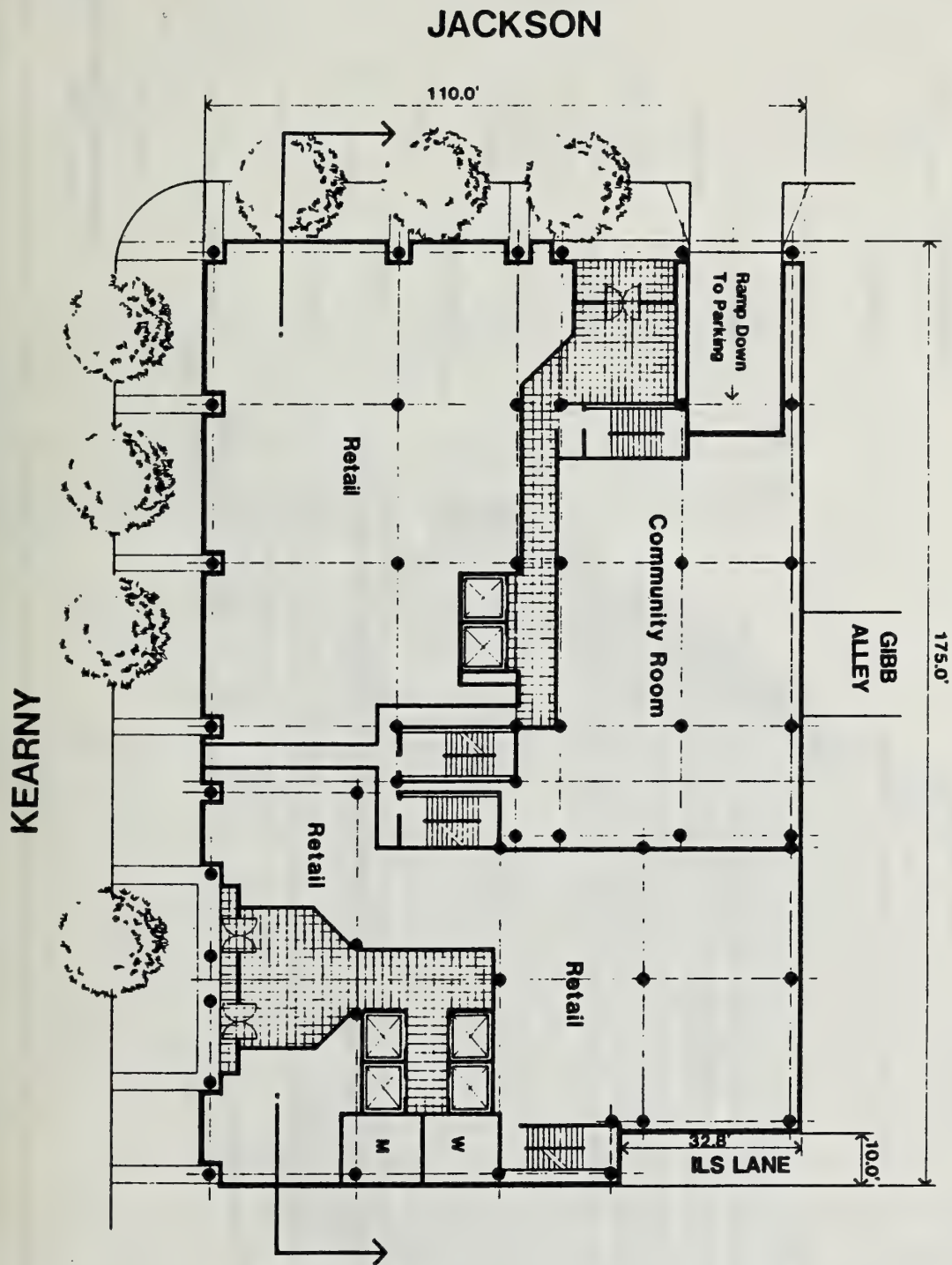


FIGURE 3
PAN MAGNA PLAZA A-SITE
JACKSON STREET ELEVATION

SOURCE: Worley K. Wong -
Ronald G. Brocchini & Associates



SOURCE: Worley K. Wong -
Ronald G. Brocchini & Associates

FIGURE 4
PAN MAGNA PLAZA A-SITE
GROUND FLOOR PLAN

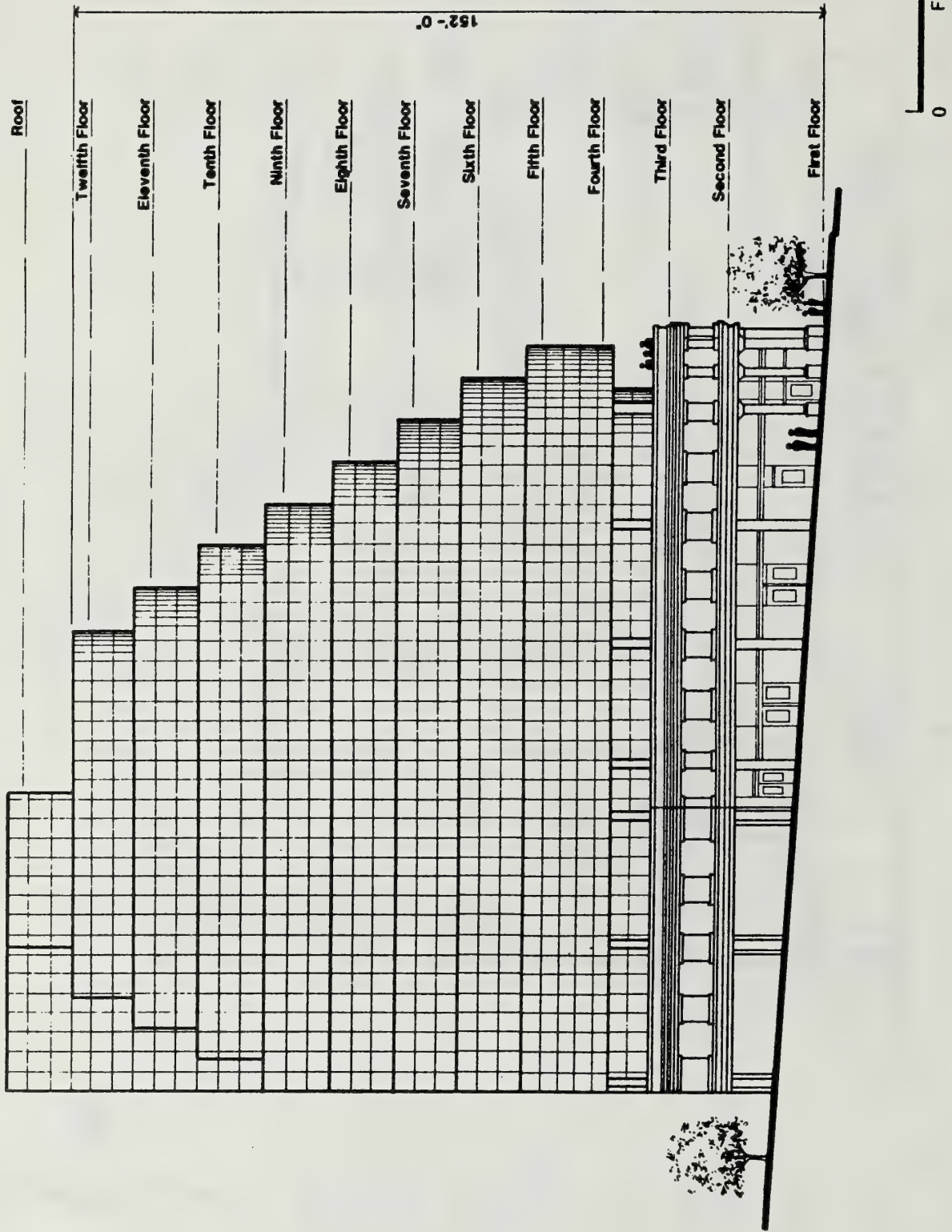


FIGURE 5
PAN MAGNA PLAZA B-SITE
WASHINGTON STREET ELEVATION

SOURCE: Worley K. Wong -
 Ronald G. Brocchini & Associates

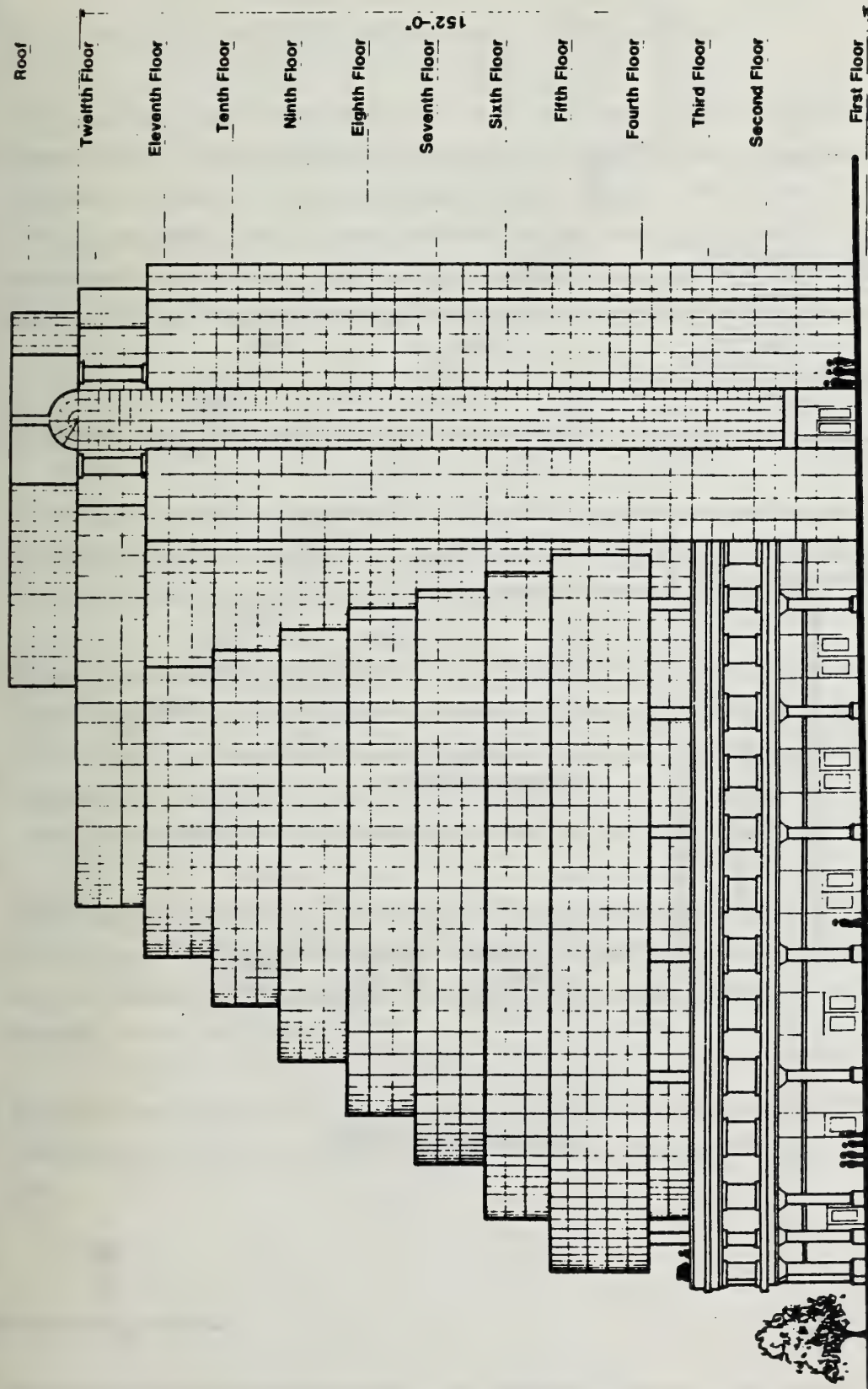


FIGURE 6
PAN MAGNA PLAZA B-SITE
COLUMBUS AVENUE ELEVATION

SOURCE: Worley K. Wong -
Ronald G. Brocchini & Associates

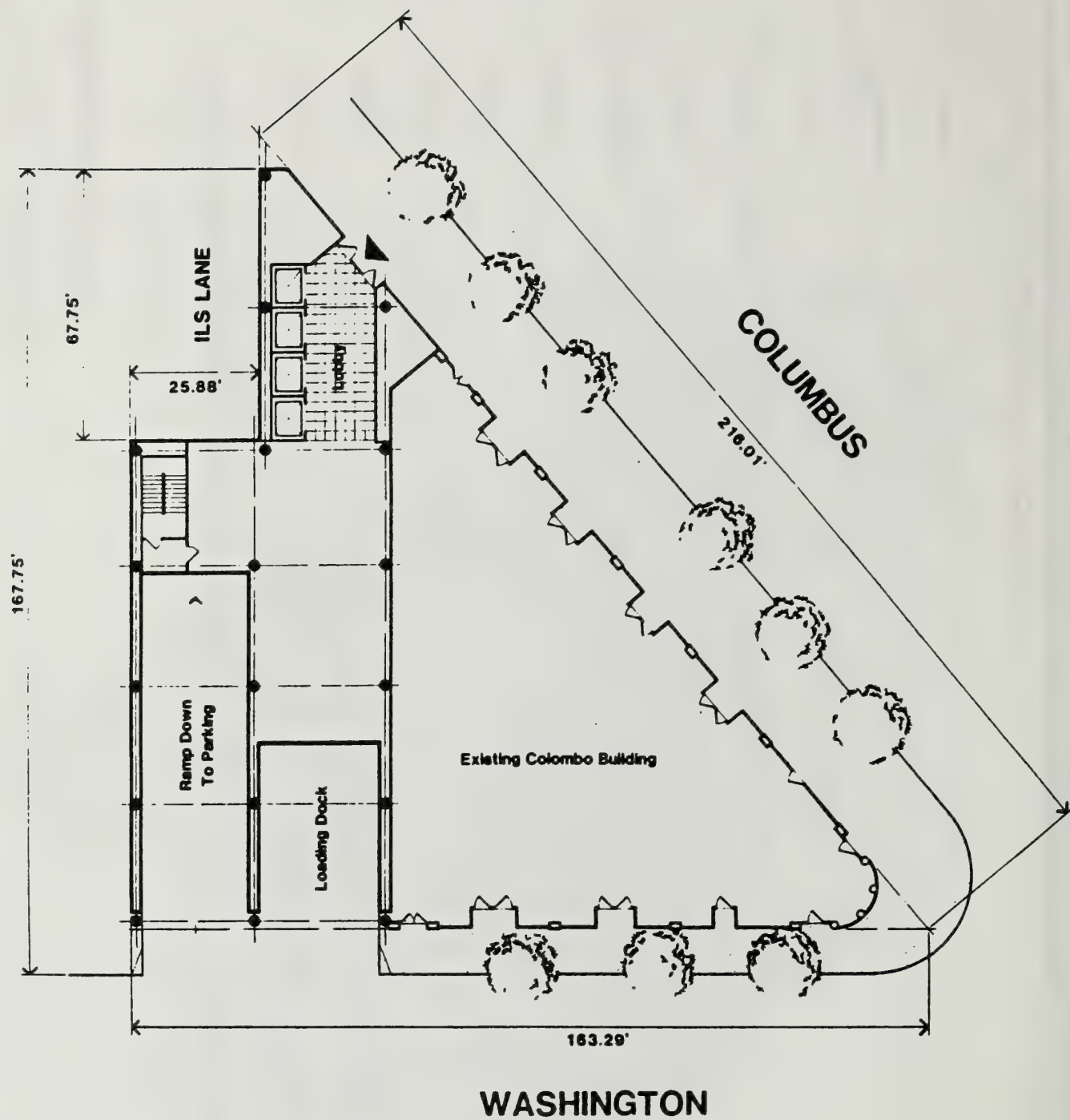


FIGURE 7
PAN MAGNA PLAZA B-SITE
GROUND FLOOR PLAN

SOURCE: Worley K. Wong -
 Ronald G. Brocchini & Associates

II. SUMMARY OF POTENTIAL ENVIRONMENTAL EFFECTS

A. EFFECTS FOUND TO BE POTENTIALLY SIGNIFICANT

The proposed project is examined in this Initial Study to identify potential effects on the environment. Some potential effects have been determined to be potentially significant, and require analysis in an environmental impact report (EIR). They include: relationship of the proposed building to, and its effect on, land uses in the project vicinity; urban design and visual quality; views affected by the project; wind and shadows; population, employment and housing demand; transportation; and traffic-generated air quality effects.

B. EFFECTS FOUND NOT TO BE SIGNIFICANT

The following potential environmental impacts were determined either to be insignificant, or would be mitigated through measures included in the project. These items require no further environmental analysis and will not be addressed in the EIR:

Noise: Construction of the project would have short-term effects on noise levels in the project vicinity; no pile driving is proposed. After completion, building operation would not perceptibly increase noise levels in the project vicinity. Operational noise would be regulated by the San Francisco Noise Ordinance and the project would conform to the Noise Guidelines of the San Francisco Comprehensive Plan (see p. 31).

Construction Air Quality: Construction of the proposed building would have short-term effects on air quality in the project vicinity. Mitigation measures to reduce particulate and hydrocarbon emissions generated during construction to insignificant levels would be included in the project (see p. 31).

Energy: The project would be designed and constructed to meet Title 24 of the California Administrative Code. Energy mitigation measures would be included in the project (see p. 33).

Utilities/Public Services: The increased demand for public services and utilities attributable to the project would not require additional personnel or equipment.

Biology: The proposed project would not have a significant effect on plants or animals.

Geology/Topography: A preliminary geotechnical report has been prepared by a California-licensed engineer and a final geotechnical report would be prepared before commencement of construction. The project sponsor and contractor would follow recommendations made in the final report regarding excavation and construction on the site (see p. 32).

Water: The proposed building would use about 55,500 gallons of water per day. Drainage patterns would not be altered. Measures to mitigate potential impacts associated with excavation and dewatering would be included in the project (see p. 32).

Hazards: The project would neither cause health hazards nor would it be affected by hazardous uses. A mitigation measure to reduce any possible conflicts with the City's Emergency Response Plan would be included in the project (see p. 33).

A. COMPATIBILITY WITH EXISTING ZONING AND PLANS	<u>N/A</u>	<u>DISCUSSE</u>
<u>D</u>		
1. Discuss any variances, special authorization, or changes proposed to the City Planning Code or Zoning Map, if applicable.	—	<u>X</u>
*2. Discuss any conflicts with the Comprehensive Plan of the City and County of San Francisco, if applicable.	—	<u>X</u>
*3. Discuss any conflicts with any other adopted environmental plans and goals of the City or Region, if applicable.	—	<u>X</u>

* Derived from State EIR Guidelines, Appendix C, normally significant effect.

The City proposes a zoning change of the project area under the City Planning Code. Interim Controls were adopted by the City Planning Commission

January 10, 1985. The Interim Amendments reclassify of the project area from C-2 (Community Businesses) to C-2-C (Chinatown Community Business).

The northern portion of A-Site is in a 65-A Height and Bulk District, which would allow a maximum height of 65 ft. (and above 40 ft. in height, maximum length and diagonal dimensions of 100 and 125 ft., respectively); the project would be about 112 ft. tall on this portion of the site. The sponsor would seek a Height and Bulk) District reclassification from 65-A to 65-D-2 for A-Site. B-Site is in a 65-D-2 Height and Bulk District (with a maximum height of 65 ft. and above 40 ft. in height maximum length and diagonal dimensions of 100 and 140 ft., respectively). Height exceptions in the 65-D-2 Height and Bulk District may be approved by the City Planning Commission as, a Conditional Use (CU) in appropriate cases up to a height of 200 ft. No building may exceed 200 ft. tall. In acting upon such a CU application the City Planning Commission must consider: "1) the siting of buildings so as to produce a stepping down of height from the Downtown office district to . . . Jackson Square; 2) avoidance of excessive bulk, intrusiveness or a continuous wall of buildings that would adversely affect views, penetration of sunlight of pedestrian amenity in Jackson Square or in any other area; and 3) respect for the historical and architectural character and special scale of Jackson Square." (City Planning Code Section 263.1)

The project is located in the Washington/Broadway Special Use District No. 1 and would thus not be required to provide parking for any use other than dwellings, since neither site exceeds 20,000 gsf. Twenty-eight parking spaces would be required for the 140 elderly housing units proposed on A-Site; 20 parking spaces are proposed on A-Site, and 31 spaces are proposed on B-Site. City Planning Code Section 159 allows required parking to be provided within 600 ft. of the dwelling units served; B-Site is within 600 ft. of A-Site. Conditional Use authorization would be required for about 12 parking spaces on B-Site.

The project sponsor would comply with the open space requirements (for residential uses) of the Planning Code.

The relationship of the project to policies of the Comprehensive Plan and provisions of the City Planning Code on subjects included in the EIR will be discussed therein. Issues related to project compatibility with zoning and plans will be discussed in the EIR.

B. ENVIRONMENTAL EFFECTS

<u>D</u>	1. <u>Land Use</u> Could the project:	<u>YES</u>	<u>NO</u>	<u>DISCUSSE</u>
	*a. Disrupt or divide the physical arrangement of an established community?	<u>—</u>	<u>X</u>	<u>X</u>
	b. Have any substantial impact upon the existing character of the vicinity?	<u>X</u>	<u>—</u>	<u>X</u>

* Derived from State EIR Guidelines, Appendix C, normally significant effect.

The project is located in a community business district characterized by residential, office and commercial land uses. The project block is on the northern edge of the Financial District and on the eastern border of Chinatown.

Most of the project block is vacant, including A-Site and Lot 4 of B-Site. Lot 5, on B-Site is occupied by the two-story Colombo Building containing ground-floor retail with office above. Other structures on the project block are two and three stories. Blocks south of the site are occupied by several high-rises exceeding 20 stories, including the 300-ft.-tall Montgomery/Washington office and residential building across Washington St. from B-Site, the 300-ft.-tall Holiday Inn and 850-ft.-tall Transamerica Pyramid Building. Blocks east, west, and north of the project site are occupied by buildings generally ranging from two to six stories. The Jackson Square Historic District occupies approximately four square blocks directly east of the project block. Portsmouth Square, a public park is located about one-half block west of B-Site and one-half block south of A-Site.

The proposed project, by itself or in conjunction with other projects, would alter the character of the area through increased intensity and scale of development. This potential effect will be discussed in the EIR.

<u>D</u>	2. <u>Visual Quality</u> Could the project:	<u>YES</u>	<u>NO</u>	<u>DISCUSSE</u>
	*a. Have a substantial, demonstrable negative aesthetic effect?	<u>—</u>	<u>X</u>	<u>X</u>

	<u>YES</u>	<u>NO</u>	<u>DISCUSSE</u>
<u>D</u>			
b. Substantially degrade or obstruct any scenic view or vista now observed from public areas?	<u>X</u>	<u> </u>	<u> X </u>
c. Generate obtrusive light or glare substantially impacting other properties?	<u> </u>	<u> X </u>	<u> </u>

* Derived from State EIR Guidelines, Appendix C, normally significant effect.

Because of nearby tall structures such as the Holiday Inn, Transamerica Pyramid and Montgomery-Washington Building, the project would not affect any views of the Bay or Berkeley Hills from nearby public areas (sidewalks or parks). The EIR will discuss short-range and long-range project visibility, and the project's relationship to the Urban Design Element of the Comprehensive Plan and to the appearance and scale of surrounding buildings.

The EIR will discuss the light and glare properties of the project.

	<u>YES</u>	<u>NO</u>	<u>DISCUSSE</u>
<u>D</u>			
3. <u>Population</u> Could the project:			
*a. Induce substantial growth or concentration of population?	<u>X</u>	<u> </u>	<u> X </u>
*b. Displace a large number of people (involving either housing or employment)?	<u> </u>	<u> X </u>	<u> X </u>
c. Create a substantial demand for additional housing in San Francisco, or substantially reduce the housing supply?	<u>X</u>	<u> </u>	<u> X </u>

* Derived from State EIR Guidelines, Appendix C, normally significant effect.

The project would accommodate about 880 permanent jobs. The existing 35 employees in the Columbo Building, would be displaced from the site (at least temporarily); relocation plans of tenant businesses are unknown at this time. The I-Hotel with about 164 long-term rooms, was demolished in anticipation of this project; its tenants were displaced. The proposed project would be expected to create a demand for housing in San Francisco. The project includes 140 residential units for the elderly. Housing and employment effects will be discussed in the EIR.

<u>D</u>	4. <u>Transportation / Circulation</u> Could the project:	<u>YES</u>	<u>NO</u>	<u>DISCUSSE</u>
	*a. Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system?	<u>X</u>	<u>—</u>	<u>X</u>
	b. Interfere with existing transportation systems, causing substantial alterations to circulation patterns or major traffic hazards?	<u>—</u>	<u>X</u>	<u>X</u>
	c. Cause a substantial increase in transit demand which cannot be accommodated by existing or proposed transit capacity?	<u>X</u>	<u>—</u>	<u>X</u>
	d. Cause a substantial increase in parking demand which cannot be accommodated by existing parking facilities?	<u>X</u>	<u>—</u>	<u>X</u>

* Derived from State EIR Guidelines, Appendix C, normally significant effect.

Increased employment, and added retail and residential traffic at the site would increase demands on existing transportation systems, including effects on the existing traffic load and capacity of the street system. The number of pedestrians in the area would also increase. The project would not cause alterations to existing circulation patterns during construction. Its effects on circulation patterns will be discussed in the EIR.

Project-related impacts and cumulative transportation, parking, transit and circulation impacts will be analyzed and described in the EIR. Relevant policies of the Transportation Element of the Comprehensive Plan also will be discussed.

<u>D</u>	5. <u>Noise</u> Could the project:	<u>YES</u>	<u>NO</u>	<u>DISCUSSE</u>
	*a. Increase substantially the ambient noise levels for adjoining areas?	<u>—</u>	<u>X</u>	<u>X</u>
	b. Violate Title 25 Noise Insulation Standards, if applicable?	<u>—</u>	<u>X</u>	<u>X</u>
	c. Be substantially impacted by existing noise levels?	<u>—</u>	<u>X</u>	<u>X</u>

* Derived from State EIR Guidelines, Appendix C, normally significant effect.

Existing Noise Levels

The noise environment of the site, like all of downtown San Francisco, is dominated by vehicular traffic noise. The Environmental Protection Element of

the San Francisco Master Plan indicates a day-night average noise level (Ldn) of 70 dBA on Kearny Street; and 75 dBA on Columbus Avenue and Washington Street adjacent to the site in 1974./1,2/

Project Construction

Project construction would take place over about 22 months, and would increase noise levels in surrounding areas. Construction noise levels would fluctuate depending on construction phase, equipment type and duration of use, distance between noise source and listener, and presence or absence of barriers between noise source and listener. To estimate probable noise impacts, this analysis assumes typical equipment and construction techniques.

Typical construction noise levels for construction activities other than pile-driving, range from 78 to 89 dBA at 50 ft./3/ No pile driving is proposed for the project. In surrounding buildings within 100 ft. of the sites, noise levels could reach 72 dBA with windows open, and 67 dBA with windows closed.

Construction noise is regulated by the San Francisco Noise Ordinance (Article 29 of the City Police Code). The ordinance requires that sound levels of construction equipment other than impact tools not exceed 80 dBA at a distance of 100 feet from the source. Impact tools (jackhammers, impact wrenches) must have both intake and exhaust muffled to the satisfaction of the Director of Public Works. Section 2908 of the Ordinance prohibits construction work at night, from 8:00 p.m. to 7:00 a.m., if noise would exceed the ambient noise level by five dBA at the project property line, unless a special permit is authorized by the Director of Public Works.

Buildings surrounding B-Site are mainly office with some residential (atop the Montgomery/Washington Building and the Holiday Inn); buildings around A-Site are office, commercial and residential. Users of Portsmouth Square, located one-half block west of B-Site and one-half block south of A-Site, would be sensitive to increases in noise levels. Noise levels above 65 dBA can interfere with normal speech and concentration, and noise levels above 45 dBA can interfere with sleep.

Two projects, at 900 Kearny Street and 732 Washington Street, are approved but not yet under construction in the project area. The schedule of these two projects is unknown. Should the construction phases of any of these projects overlap, noise impacts could be increased.

In summary, during the majority of construction activity, noise levels would be expected to be at or below existing levels in the area. There would be times, particularly during the operation of impact wrenches, when noise would interfere with indoor activities in nearby offices, retail stores, and residences.

Mitigation measures to minimize construction noise are included in the project (see p. 31). Discussion of construction noise will not be included in the EIR.

Project Operation

The Environmental Protection Element of the Master Plan contains guidelines for determining the compatibility of various land uses with different noise environments. For office uses the guidelines recommend no special noise control measures in an exterior noise environment up to an Ldn of 70 dBA. For the 75 dBA noise level, the guidelines recommend an analysis of noise reduction requirements and inclusion of noise insulation features in the building design. For residential uses, the Element states that new construction should be discouraged for noise levels above 65 dBA. If development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design. The project sponsor has indicated that noise insulation measures would be included as part of the design. The proposed structure would include housing, so Title 25 Noise Standards would be applicable.

Project operation would not result in perceptibly greater noise levels than those existing in the area. The amount of traffic generated by the project during any hour of the day, and cumulative traffic increases at the time of project completion, would cause traffic noise levels to increase by one dBA or less. To produce a noticeable increase in environmental noise, a doubling of existing traffic volume would be required; traffic increases of this magnitude

would not occur with anticipated cumulative development, including the project./4/

The project sponsor would be required to comply with the San Francisco Noise Ordinance, San Francisco Police Code Section 2909, "Fixed Source Noise Levels," which regulates mechanical equipment noise. The project site is in the proposed C-2-C zoning district, and is adjacent to the C-3-O zoning district. In C-2 and C-3-O districts, the ordinance limits equipment noise levels at the property line to 70 dBA between 7:00 a.m. and 10:00 p.m. and 60 dBA between the hours of 10 p.m. and 7 a.m. During lulls in traffic, mechanical equipment generating 70 dBA could dominate the noise environment at the site. The project engineer and architect would include design features in the building to limit mechanical equipment noise levels to 60 dBA. As equipment noise would be limited to 60 dBA to meet the nighttime limit, it would not be perceptible above the ambient noise levels in the project area. Discussion of operational noise will not be included in the EIR.

NOTES - Noise

/1/ dBA is a measure of sound in units of decibels (dB). The "A" denotes the A-weighted scale, which simulates the response of the human ear to various frequencies of sound.

/2/ Ldn, the day-night average noise level, is a noise measurement based on human reaction to cumulative noise exposure over a 24-hour period, taking into account the greater annoyance of nighttime noises; noise between 10 p.m. and 7 a.m. is weighted 10 dBA higher than daytime noise.

/3/ Bolt, Beranek and Newman, December 31, 1971, Noise from Construction Equipment and Operations, Buiding Equipment and Home Appliances, prepared for the US Environmental Protection Agency.

/4/ See Downtown Plan EIR (EE81.3E), Continuous Section IV.E. generally and Section IV.J., pp. IV.J.8-18. Increases of 1 dBA or less in environmental noise are not noticeable by most people outside a laboratory situation (National Academy of Sciences, Highway Research Board, Rsch. Rpt. No. 117 (1971)). (See also FHWA Highway Traffic Noise Prediction Model, Report #FHWA-RD-77-108, December 1978, p. 8 regarding doubling of traffic volumes producing increases of three dBA or more, which are noticed by most people.)

<u>D</u>	6. <u>Air Quality / Climate</u> Could the project:	<u>YES</u>	<u>NO</u>	<u>DISCUSSE</u>
	*a. Violate any ambient air quality standard or contribute substantially to an existing or projected air quality violation?	<u>X</u>	<u>—</u>	<u>X</u>
	*b. Expose sensitive receptors to substantial pollutant concentrations?	<u>—</u>	<u>X</u>	<u>X</u>
	c. Permeate its vicinity with objectionable odors?	<u>—</u>	<u>X</u>	<u>—</u>
	d. Alter wind, moisture or temperature (including sun shading effects), so as to substantially affect public areas, or change the climate either in the community or the region?	<u>X</u>	<u>—</u>	<u>X</u>

* Derived from State EIR Guidelines, Appendix C, normally significant effect.

Two types of air quality impacts could be expected from the proposed building: short-term impacts from construction activity, and long-term impacts related to use and operation of the structure. Construction activities would temporarily affect local air quality. Dust emissions during demolition and excavation would increase particulate concentrations adjacent to the site. Dustfall can be expected at times on surfaces within 200 to 400 ft. of the site under low winds; under high winds, human discomfort may occur downwind from blowing dust.

The project sponsor has agreed to mitigation measures to reduce particulate emissions generated during construction activities (see p. 31). Construction air quality effects will not be discussed in the EIR.

Building emissions and project-generated traffic emissions and their effects on local and regional air quality will be discussed in the EIR.

The proposed building could increase shadows on sidewalks and public open space (Portsmouth Square) near the site. This will be discussed in the EIR.

A wind tunnel analysis has been recommended by a certified consulting meteorologist (Donald Ballanti, certified meteorologist, letter, January 11, 1985) and will be prepared for discussion in the EIR.

<u>D</u>	7. <u>Utilities / Public Services</u> Could the project:	<u>YES</u>	<u>NO</u>	<u>DISCUSSE</u>
	*a. Breach published national, state or local standards relating to solid waste or litter control?	—	<u>X</u>	<u>X</u>
	*b. Extend a sewer trunk line with capacity to serve new development?	—	<u>X</u>	—
	c. Substantially increase demand for schools, recreation or other public facilities?	—	<u>X</u>	—
	d. Require major expansion of power, water, or communications facilities?	—	<u>X</u>	—

* Derived from State EIR Guidelines, Appendix C, normally significant effect.

The proposed project would contribute to the cumulative demand for community services city-wide. Cumulative impacts upon solid waste and wastewater service providers have been analyzed in the Downtown Plan EIR and no significant impacts have been identified. The Downtown Plan EIR setting and impacts discussion for solid waste and wastewater (Vol. 1, pp. IV.F.1-2 and IV.F.8-10; Vol. 2, pp. A.7 and K.12-2, Vol. 3, pp. C&R F.1-4), is summarized below and incorporated by reference herein.

The City's (C-3 and non-C-3) solid waste is currently disposed of at the Altamont Hills landfill, pursuant to a five-year contract which expires November 1, 1988. The City is currently searching for additional landfill capacity to accommodate the City's solid waste generated in the years after 1988.

A sewer system is being built pursuant to the City's Clean Water Program. The system is intended to handle combined volumes of sewage and rainwater runoff. Since the capacity of the system is designed to handle rainwater flows (which can be 60 times the volume of regular sewage) additional development city-wide would not affect operation of the sewer system.

Providers of all other utilities and services have been contacted and have indicated that existing capacities are adequate to serve the proposed project. Statements from utility and service providers are available for

public review at the Department of City Planning, Office of Environmental Review, 450 McAllister Street. No further analysis is necessary in the EIR.

8. <u>Biology</u> Could the project:	<u>YES</u>	<u>NO</u>	<u>DISCUSSE</u>
<u>D</u>			
*a. Substantially affect a rare or endangered species of animal or plant or the habitat of the species?	—	<u>X</u>	—
*b. Substantially diminish habitat for fish, wildlife or plants, or interfere substantially with the movement of any resident or migratory fish or wildlife species?	—	<u>X</u>	—
c. Require removal of substantial numbers of mature, scenic trees?	—	<u>X</u>	—

* Derived from State EIR Guidelines, Appendix C, normally significant effect.

The project site is covered with impervious surfaces. The project would not affect any plant or animal habitat. There will be no further discussion in the EIR.

9. <u>Geology / Topography</u> Could the project:			
*a. Expose people or structures to major geologic hazards (slides, subsidence, erosion and liquefaction)?	—	<u>X</u>	<u>X</u>
b. Change substantially the topography or any unique geologic or physical features of the site?	—	<u>X</u>	—

* Derived from State EIR Guidelines, Appendix C, normally significant effect.

A-Site is at about 25 ft. San Francisco City Datum and B-site is at about 14 ft. San Francisco City Datum./1/ Geologic maps covering the area indicate that the project sites are underlain by artificial fill. Available boring data in the project vicinity indicate that the sites are underlain by five to ten feet of base to medium dense sandy fill, with about five feet of stiff clay beneath, and dense to very dense sand under the clay. Bedrock is estimated to be about 40 ft. below ground level on A-Site and 60 ft. below ground level on B-Site. Groundwater was encountered at a depth of approximately 20 feet in previous investigations./2/

Since the dense to very dense sand layer is located close to the excavation depth, pile foundations are not appropriate. The proposed structures would probably be supported by either mat foundation or cast-in-place concrete or drilled piers. Sheet piles and shoring systems would be installed around the boundary of proposed excavations. No further excavation below the existing basements on the sites would be required.

The closest active faults to San Francisco are the San Andreas Fault, about 9 miles southwest of Downtown, and the Hayward and Calaveras Faults, about 15 and 30 miles east of Downtown, respectively. The project area would experience strong (Intensity Level D, general but not universal fall of brick chimneys, cracks in masonry and brick work) groundshaking during a major earthquake./3/ The building would be required to meet current seismic engineering standards of the San Francisco Building Code. (See Mitigation Measures for the project's emergency response plan).

NOTES - Geology, Hydrology, Seismology

/1/ San Francisco City Datum establishes the City's "0" point for surveying purposes is at approximately 8.6 feet above mean sea level.

/2/ Allstate Geotechnical Services, Preliminary Geotechnical Investigation Services, January 14, 1985. This report is available for review at the Office of Environmental Review, 450 McAllister St., Fifth Floor, San Francisco.

/3/ URS/John Blume and Associates, San Francisco Seismic Safety Investigation, 1974. Groundshaking intensities that would result from a major earthquake were projected and classified on a five-point scale ranging from E (Weak) through A (Very Violent).

10. <u>Water</u> Could the project:	<u>YES</u>	<u>NO</u>	<u>DISCUSSE</u>
<u>D</u>			
*a. Substantially degrade water quality, or contaminate a public water supply?	—	<u>X</u>	—
*b. Substantially degrade or deplete ground water resources, or interfere substantially with ground water recharge?	—	<u>X</u>	—
*c. Cause substantial flooding, erosion or siltation?	—	<u>X</u>	—

* Derived from State EIR Guidelines, Appendix C, normally significant effect.

Site runoff would drain into the City's combined sanitary and storm sewage system. The project would not affect drainage patterns or water quality because the sites have been or are now entirely covered with impermeable

surfaces. The proposed buildings would increase domestic water use on the sites to a projected 55,500 gpd. No further discussion of this issue in the EIR is necessary.

<u>D</u>	11. <u>Energy / Natural Resources</u> Could the project:	<u>YES</u>	<u>NO</u>	<u>DISCUSSE</u>
*a.	Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?	—	<u>X</u>	<u>X</u>
b.	Have a substantial effect on the potential use, extraction, or depletion of a natural resource?	—	<u>X</u>	<u>X</u>

* Derived from State EIR Guidelines, Appendix C, normally significant effect.

A-Site is currently vacant. Annual energy consumption by existing uses on B-Site, is about 45,000 kWh and about 2,000 therms per year.

Fabrication and transportation of building materials, worker transportation, site development, and building construction would require about 400 billion Btu of gasoline, diesel fuel, natural gas, and electricity./1,2/ Distributed over the estimated 50-year life of the project, this would be about eight billion Btu per year, or about 20% of annual building energy requirements.

Table 2, shows the estimated operational energy which would be used by the project. Project demand for electricity during PG&E's peak electrical load periods, July and August afternoons, would be about 985 kW, an estimated 0.006% of PG&E's peak load in PG&E's service area of 16,000 MW./3/ Project demand for natural gas during the peak natural gas load periods, January mornings, would be 14,000 Btu per day, or about 0.004% of the peak load in PG&E's service area of about 3.7 billion Btu per day./3/ Annual and peak daily electricity and natural gas consumption are shown in Figures 8 and 9, pp. 27 and 28.

Increased San Francisco energy demands to the year 2000 would be met by PG&E from nuclear sources, oil and gas facilities, hydroelectric and geothermal facilities, and other sources such as cogeneration, wind and imports. PG&E plans to continue receiving most of its natural gas from Canada and Texas under long-term contracts.

TABLE 2: ESTIMATED PROJECT ENERGY USE/a/

Daily Natural Gas Consumption/b/

Estimated natural gas consumption per sq. ft.	11 Btu/c/
Estimated peak daily natural gas consumption	74 Therms

Monthly Electric Consumption/b/

Estimated electrical consumption per sq. ft.	1 kWh (10,239 Btu)/d/
Estimated total electrical consumption	305,000 kWh (3.1×10^9 Btu)

Annual Consumption

Estimated total annual natural gas consumption	10,600 Therms
Estimated total annual electrical consumption	3.6×10^6 kWh (40×10^9 Btu)
Connected kilowatt load	4,765 Kilowatts
Estimated total annual energy consumption	41×10^9 Btu (75,000 barrels of oil)

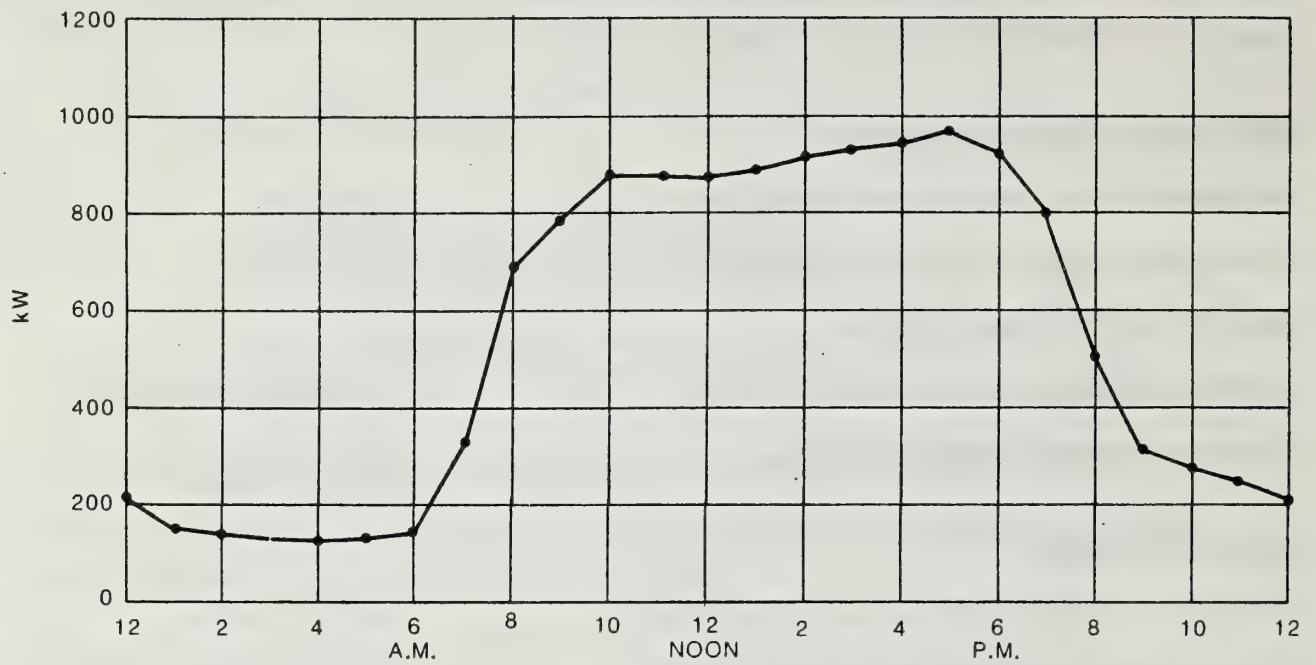
/a/ Energy use includes space conditioning, service water heating and lighting in accordance with allowable limits under Title 24. Estimated electricity includes an additional 1 kWh/sq. ft./yr., consumed by appliances such as typewriters, computers, coffeemakers, etc. than assumed by Title 24 estimates.

/b/ The project's energy consumption characteristics were projected by Glumac & Associates, Inc., Consulting Engineers, (Glenn D. Claycombe, P.E., letter, dated June 10, 1985). These calculations are available for review at the Office of Environmental Review, 450 McAllister Street, San Francisco, California.

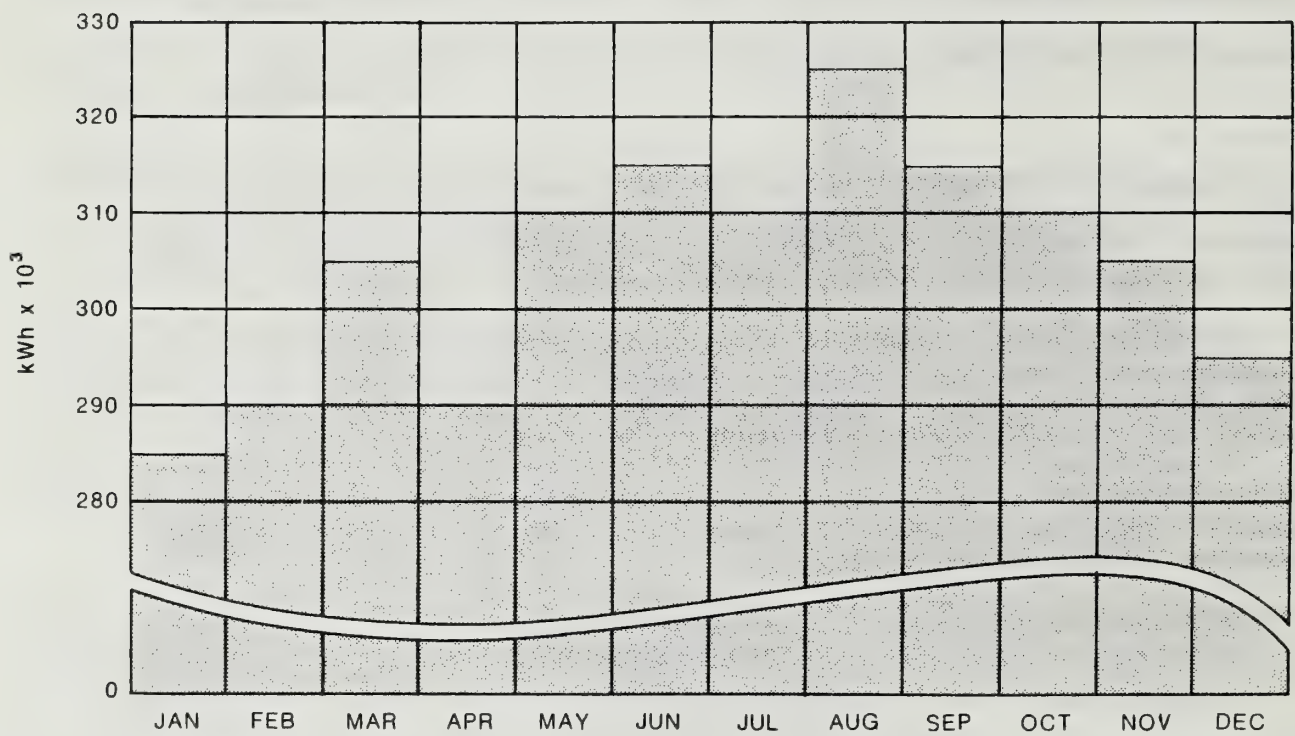
/c/ Btu (British thermal unit): A standard unit for measuring heat. Technically, it is the quantity of heat required to raise the temperature of one pound of water 1 degree Fahrenheit (251.97 calories) at sea level.

/d/ Energy Conversion Factors:	one gallon gasoline	=	125,000 BTU
	one kilowatt (kW)	=	10,239 BTU
	one therm	=	100,000 BTU
	one barrel oil	=	5,600,000 BTU

SOURCE: Department of City Planning, Glumac & Associates, and ESA.



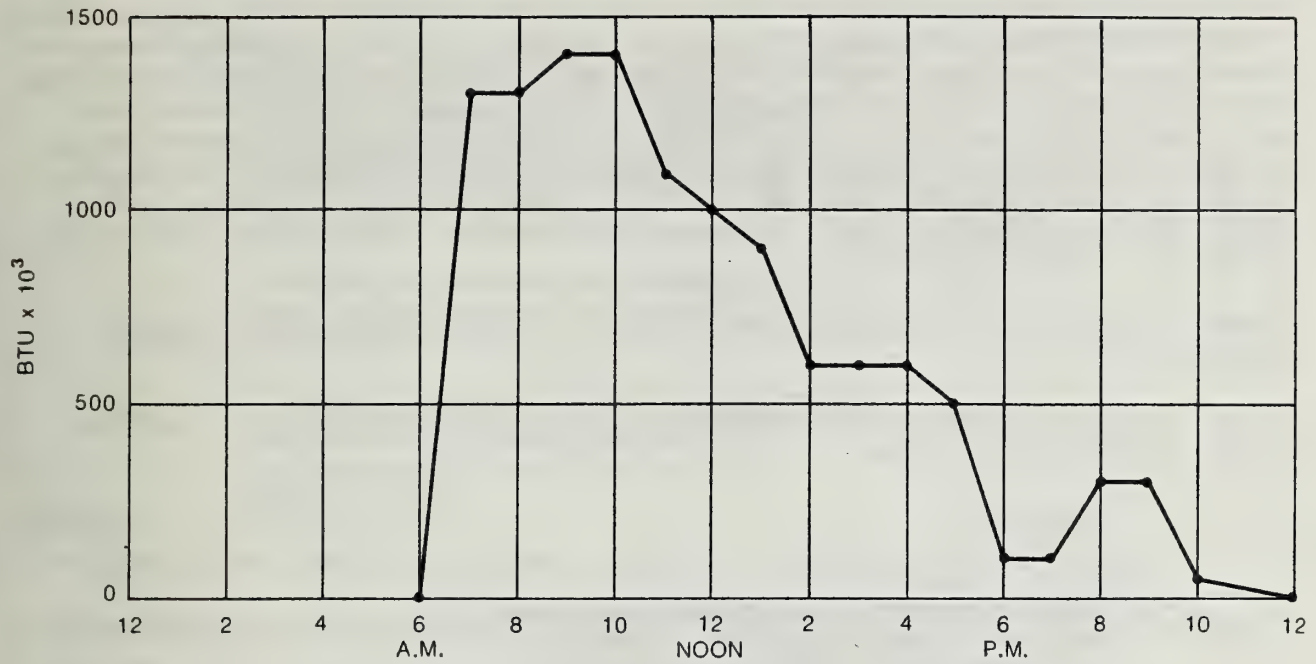
PEAK DAY (AUGUST) ELECTRICAL LOAD DISTRIBUTION



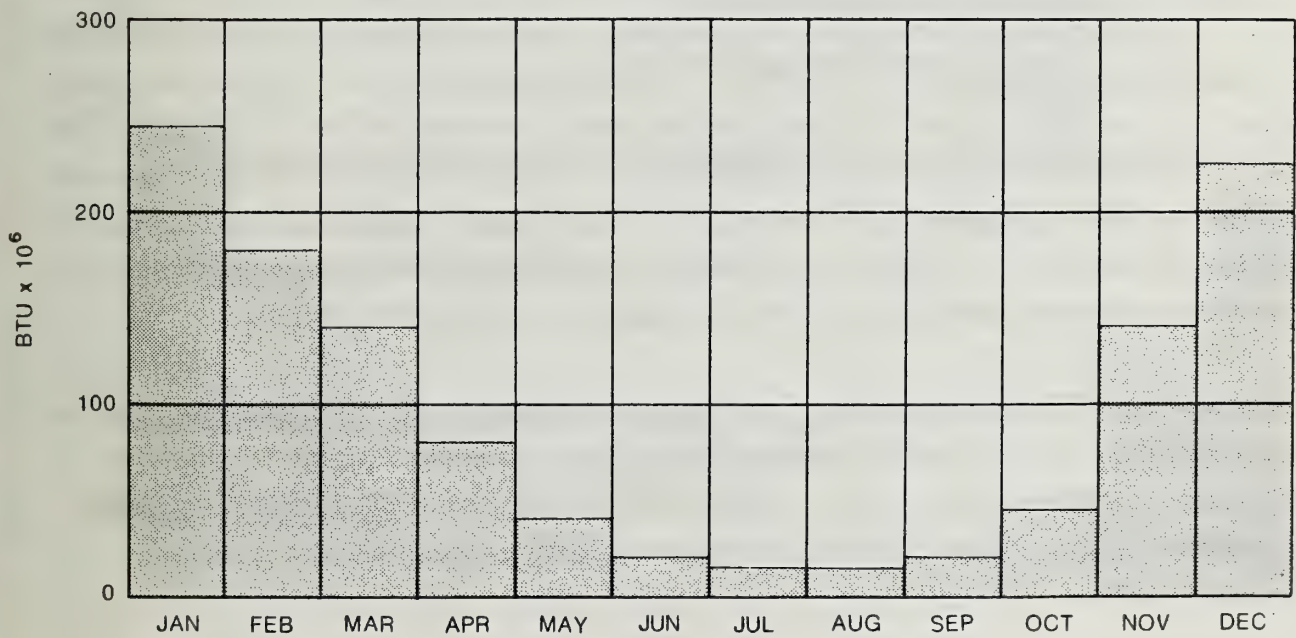
ANNUAL ELECTRICITY CONSUMPTION

**FIGURE 8
PAN MAGNA PLAZA
PROJECTED ELECTRICAL
DISTRIBUTION CURVES**

SOURCE: Glumac & Associates



PEAK DAY (JANUARY) NATURAL GAS LOAD DISTRIBUTION



ANNUAL NATURAL GAS CONSUMPTION

**FIGURE 9
PAN MAGNA PLAZA
PROJECTED NATURAL GAS
DISTRIBUTION CURVES**

SOURCE: Glumac & Associates

NOTES - Energy

/1/ The British thermal unit (Btu) is the quantity of heat required to raise the temperature of one pound of water one degree Fahrenheit at sea level. The term "at-source" means of that adjustments have been made in the calculation of the thermal energy equivalent (Btu) for losses in energy that occur during generation, transmission, and distribution of the various energy forms as specified in: ERCDC, 1977, Energy Conservation Design Manual for New Non-Residential Buildings, Energy Conservation and Development Commission, Sacramento, California, and Apostolos, J.A., W.R. Shoemaker, and E.C. Shirley, 1978 Energy and Transportation System, California Department of Transportation, Sacramento, California, Project #20-7, Task 8.

/2/ Hannon, B., et. al., 1978, "Energy and Labor in the Construction Sector", Science 202:837-847.

/3/ San Francisco Department of City Planning, Downtown Plan EIR (EE81.3), certified October 18, 1984, pp. IV.G.3-4.

12. <u>Hazards</u>		<u>YES</u>	<u>NO</u>	<u>DISCUSSE</u>
<u>D</u>				
*a.	Create a potential public health hazard or involve the use, production or disposal of materials which pose a hazard to people or animal or plant populations in the area affected?	—	<u>X</u>	—
*b.	Interfere with emergency response plans or emergency evacuation plans?	—	<u>X</u>	<u>X</u>
c.	Create a potentially substantial fire hazard?	—	<u>X</u>	<u>X</u>

* Derived from State EIR Guidelines, Appendix C, normally significant effect.

The project would increase the number of people on the site, which would increase the difficulty of evacuating the site in an emergency. The hazard mitigation measure committed to by the sponsor (see p. 33) would serve to mitigate this impact.

There are two PCB-type transformers in the project vicinity, one in the garage at Kearny and Washington, and one located one block east of the site on Washington St. All PCB-type transformers in San Francisco are to be replaced by 1987. (Thomas H. Jenkin, Emergency Facility Planner, Office of Emergency Services, questionnaire response, January 9, 1985.)

There will be no further discussion of hazards in the EIR.

13. Cultural

YES NO DISCUSSE

D

- | | | | | |
|-----|--|----------|----------|----------|
| *a. | Disrupt or adversely affect a prehistoric or historic archaeological site or a property of historic or cultural significance to a community or ethnic or social group; or a paleontological site except as a part of a scientific study? | <u>X</u> | — | <u>X</u> |
| *b. | Conflict with established recreational, educational, religious or scientific uses of the area? | — | <u>X</u> | — |
| c. | Conflict with preservation of any buildings subject to the provisions of Article 10 or (proposed) Article 11 of the City Planning Code. | — | <u>X</u> | — |

* Derived from State EIR Guidelines, Appendix C, normally significant effect.

An archaeological archival search, being performed by Allen Pastron, will be discussed in the EIR.

The demolished International Hotel (A-Site) was on the National Register of Historic Places. In the 1976 Department of City Planning Architectural Inventory the Colombo Building (B-Site) was given a summary rating of 3 and was recommended for City Landmark Status. It has not been designated a Landmark. The proposed project area is next to but not within the Jackson Square Historic District. This District, which is on the National Register of Historic Places, contains buildings having special historical, architectural and aesthetic interest and constitutes a distinct section of San Francisco. Architectural resources will be discussed in the EIR.

C. OTHER

Require approval of permits from City Departments other than Department of City Planning or Bureau of Building Inspection, or from Regional, State or Federal Agencies?

— X —

D. MITIGATION MEASURES**D****YES NO N/A DISCUSSE**

1. If any significant effects have been identified, are there ways to mitigate them?

 X — — X

2. Are all mitigation measures identified above included in the project?

 X — — X

The following are mitigation measures related to topics determined to require no further analysis in the EIR. The EIR will contain a mitigation chapter describing these measures and other measures which would be, or could be, adopted to reduce potential adverse effects of the project as identified in the EIR.

Noise

- The project sponsor would require the project contractor to muffle and shield intakes and exhaust and use electric-powered, rather than diesel-powered, construction equipment, as feasible, so that noise would not exceed limits stated in the City's Noise Ordinance (Article 29, San Francisco Administrative Code, 1972).
- The project sponsor would require the general contractor to construct barriers around the site and stationary equipment such as compressors, which would reduce construction noise by as much as five dBA, and to locate stationary equipment in pit areas or excavated areas as these areas would serve as noise barriers.
- An analysis of noise reduction measurements would be prepared by the project sponsor and recommended noise insulation features would be included as part of the proposed building, as recommended by the Environmental Protection Element of the San Francisco Comprehensive Plan. Such design features could include fixed windows and climate control.

Construction Air Quality

- The project sponsor would require demolition and construction contractors to sprinkle demolition sites with water continuously during demolition

activity; sprinkle unpaved construction areas with water at least twice per day; cover stockpiles of soil, sand, and other such material; cover trucks hauling debris, soil, sand, or other such material; and sweep streets surrounding demolition and construction sites at least once per day to reduce Total Suspended Particulate (TSP) emissions. The contractor would also be required to maintain and operate construction equipment so as to minimize exhaust emissions of TSP and other pollutants, by such means as a prohibition on idling motors when equipment is not in use or when trucks are waiting in queues, and implementation of specific maintenance programs (to reduce emissions) for equipment that would be in frequent use for much of a construction period.

Geology/Topography

- A detailed foundation and structural design study would be conducted for the building by a California-licensed structural engineer and a geotechnical consultant. The project sponsor would follow the recommendations of these studies during the final design and construction project.
- If dewatering were necessary, any groundwater pumped from the site would be retained in a holding tank to allow suspended particles to settle, if this is found necessary by the Industrial Waste Divisions of the Department of Public Works, to reduce the amount of sediment entering the storm drain/sewer lines.
- Should dewatering be necessary, the final soils report would address the potential settlement and subsidence impacts of this dewatering. Based upon this discussion, the soils report would contain a determination as to whether or not a lateral and settlement survey should be done to monitor any movement or settlement of surrounding buildings and adjacent streets. If a monitoring survey is recommended, the Department of Public Works would require that a Special Inspector (as defined in Article 3 of the Building Code) be retained by the project sponsor to perform this monitoring. Groundwater observation wells would be installed to monitor the level of the water table and other instruments would be used to

monitor potential settlement and subsidence. If, in the judgment of the Special Inspector, unacceptable subsidence were to occur during construction, groundwater recharge would be used to halt this settlement. The project sponsor would delay construction if necessary. Costs for the survey and any necessary repairs to service under the street would be borne by the project sponsor.

Energy

- The project would incorporate energy mitigation such as variable air volume HVAC, 100% outside air economizer, multiple light switching and flow restrictors for plumbing fixtures.

Hazards

- An evacuation and emergency response plan would be developed by the project sponsor, in consultation with the Mayor's Office of Emergency Services (OES), to insure coordination between the City's emergency planning activities and the project plan and to provide services to building occupants in the event of an emergency. The project emergency plan would be reviewed by the OES and implemented by building management, insofar as feasible, before issuance by the Department of Public Works of final building permits.
- To expedite implementation of the City's emergency response plan, the project sponsor would prominently post information for building occupants concerning what to do in the event of a disaster.

E. ALTERNATIVES

Alternatives to the proposed project include the following:

- A. No Project; A-Site would remain in its existing vacant condition, the Colombo Building would remain in its existing condition.

- B. A building which would cast no new shadow on Portsmouth Square on B-Site; A-Site would be as for the project.
- C. Preservation Alternative; only one additional story (covering no more than 75% of the building footprint) would be put on the Colombo Building, a new three story building would be built adjacent to the Colombo Building on the west; a Code-complying building (65 ft. tall or less, 4.8:1 FAR) would be built on A-Site.
- D. Demolition of Colombo Building, entirely new construction on B-Site; A-Site would be as for the proposed project.

F. D	MANDATORY FINDINGS OF SIGNIFICANCE	<u>YES</u>	<u>NO</u>	<u>N/A</u>	<u>DISCUSSE</u>
	*1. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or pre-history?	—	<u>X</u>	—	—
	*2. Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals?	—	<u>X</u>	—	—
	*3. Does the project have possible environmental effects which are individually limited, but cumulatively considerable? (Analyze in the light of past projects, other current projects, and probable future projects.)	<u>X</u>	—	—	<u>X</u>
	*4. Would the project cause substantial adverse effects on human beings, either directly or indirectly?	—	<u>X</u>	—	—
	*5. Is there a serious public controversy concerning the possible environmental effect of the project?		X		

* Derived from State EIR Guidelines, Appendix C, normally significant effect.

G. ON THE BASIS OF THIS INITIAL STUDY:

_____ I find the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared by the Department of City Planning.

_____ I find that although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because the mitigation measures, numbers _____ in the discussion, have been included as part of the proposed project. A NEGATIVE DECLARATION will be prepared.

 X I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required,

Barbara W. Sahm

Barbara W. Sahm
Environmental Review Officer

for

Dean L. Macris
Director of Planning

Date: 7/2/85

FEDERAL AND STATE AGENCIES

Northwest Information Center
California Archaeological Inventory

California Department of Transportation
Business and Transportation Agency

REGIONAL AGENCIES

Association of Bay Area Governments

Bay Area Air Quality Management
District

California Department of Transportation
Public Transportation Branch

CITY AND COUNTY OF SAN FRANCISCO

Bureau of Building Inspection
City Attorney's Office
Landmarks Preservation Advisory Board
Mayor's Economic Development Council
Public Utilities Commission

Public Utilities Commission
Bureau of Energy Conservation

Recreation & Park Department

San Francisco Bureau of Engineering

San Francisco Department of
Public Works
Bureau of Engineering

San Francisco Department of
Public Works
Mechanical Engineering Section

San Francisco Department of
Public Works
Traffic Engineering Division

San Francisco Fire Department

San Francisco Municipal Railway

San Francisco Real Estate Department

Water Department

GROUPS AND INDIVIDUALS

Wayne Alba, Realtor

Helen Bautista

Gordon Chin
Chinatown Neighborhood Improvement
Resource Center

Dick Chinn
Dick Chinn Realty

Buck Him Chung
Superior Trading Co.

Charles Collin

Crow-Speiker #99

Henry Der
Chinese for Affirmative Action

Michael Dyett

Heidi Elison
Asian Week

Howard Ellman
Ellman, Burke & Cassidy

Dan Gonzales

Ed Illumin

Dale King, President
Chinese Chamber of Commerce

Ed Lee, Director
Asian Law Caucus

APPENDIX B: WIND STUDY METHODOLOGY

This summary of wind study methodology is based on studies by Bruce R. White, Ph.D., Associate Professor of Mechanical Engineering at the University of California, Davis. The studies are independent of the University. These reports are available for review at the Department of City Planning, Office of Environmental Review, 450 McAllister St.

INTRODUCTION

Wind tunnel tests were conducted for winds in the project vicinity in its existing condition, and with the project and alternatives, in relation to the Downtown Plan wind performance criteria (adopted by the City Planning Commission, November 29, 1984). Wind tunnel measurements were used to predict equivalent mean wind speeds/1/ near the project site. These mean wind speeds were compared to comfort levels of 11 mph for pedestrian areas and seven mph for sitting areas.

A 1 inch = 50 feet scale model of the downtown San Francisco area surrounding the proposed building for several blocks in all directions was provided by Environmental Science Associates, Inc. The model tested three configurations: existing; project, and project with an extended wind screen. The approved project for 100 First Street was included in the model.

The model was tested in a wind tunnel that allows testing of natural atmospheric boundary layer flows past surface objects such as buildings and other structures. The tunnel has an overall length of 22 meters (m) (72 feet), a test section of 1.22 m (4 feet) wide by 1.83 m (6 feet) high, and an adjustable false ceiling. The adjustable ceiling and turbulence generators allow speeds within the tunnel to vary from 1 to 4 meters per second (m/s) or 4.8 to 19.3 miles per hour (mph).

The wind tunnel study was divided into two parts: flow visualization and wind-speed measurements. The flow visualization observations were performed by injecting a continuous stream of smoke at various near-surface locations. The subsequent motion of the smoke was recorded, and prevailing wind directions were determined. Wind-speed measurements were made with a hot-wire anemometer, an instrument that directly relates rates of heat transfer to wind speeds by electronic signals. The hot-wire signals are proportional to the magnitude and steadiness of the wind. Both the mean wind speeds and corresponding turbulence intensities were measured. Thus, high wind speeds and gustiness (changes in wind speeds over short periods of time) could be detected. Hot-wire measurements made close to the surface have an inherent uncertainty of $\pm 5\%$ of the true values. The ratio of near-surface speed to reference wind speed was calculated from the hot-wire measurements.

Twenty-four test locations were studied for four prevailing wind directions (northwesterly, west-northwesterly, and westerly) for the four configurations. These wind conditions are the most common in San Francisco, and are therefore the most representative for evaluation purposes. All hot-wire measurements were taken at the same series of surface points around the building site for the four wind directions and the existing and project settings. Only the five points on the sun terrace (locations 21, 22, 23, 24, and 28) were tested in the third setting with the extended wind screen. Winds at the other locations are not likely to be affected by the wind screen along the terrace.

Methodology and Assumptions

The wind ordinance associated with the Downtown Plan (Section 148) is defined in terms of equivalent wind speed. This term denotes a one-hour average wind speed (mean velocity), adjusted to include the level of gustiness and turbulence.

The mean wind speeds at street level were determined by a wind tunnel test, and a comparison of the test results with statistically representative records of wind data collected atop the Old Federal Building. Data describing the speed, direction and frequency of occurrence of winds were gathered at the Old San Francisco Federal Building, at 50 United Nations Plaza, during the six-year period 1945 to 1950. Hourly measurements have been tabulated for each month (averaged over the six years) in three-hour periods using seven classes of wind speed and 16 compass directions. Analysis of these data shows that during the hours from 6:00 a.m. to 8:00 p.m., about 62% of the winds blow from four of the 16 directions, as follows: Northwest (NW), 10%; West Northwest (WNW), 14%; West (W), 35%; Southwest (WSW), 2% and, all other winds, 36%; calm conditions occur 2% of the time.

Each wind tunnel test measurement results in a ratio that relates the speed of ground-level wind to the speed at the reference elevation, in this case the height of the old San Francisco Federal Building. The wind that is measured is an equivalent wind speed value which is adjusted to include the level of gustiness or turbulence present.

The frequency with which a particular wind velocity is exceeded at any test location is then calculated by using the measured wind tunnel ratios and a specified ground speed to determine the corresponding reference wind speed for each direction. In general, this gives different reference speeds for each direction (NW, WNW, W, WSW, and Other). The wind data for San Francisco are then used to calculate the percentage of the time each reference speed would be exceeded. The sum of these is the total percentage of time that the specified ground-level wind speed is exceeded. A computer is used to calculate the total percentages for a series of wind speeds until the speed corresponding to the speed exceeded 10% of the time is found. Throughout the following discussion, the wind speeds reported refer to the equivalent wind speeds that would be exceeded 10% of the time.

Study Results

The results of the wind tunnel study are summarized in Figure B-1, together with the locations of the measurement points.

Existing Setting

Existing winds in the project vicinity range from three mph to eight mph. Winds do not currently exceed the applicable comfort criterion.

Project

The project would result in winds which range from four mph to nine mph. The project would cause winds to decrease at five of the 24 locations. Winds would be unchanged at three locations and would be increased at 15 locations. One location (location 28) is not available for testing in the existing setting. Winds at each location would meet the applicable comfort criterion.

violate the 11 mph pedestrian comfort criterion. The comfort criterion would be violated four percent of the time at location 2, three percent of the time at location 6, and five percent of the time at location 9.

Code-Conforming Alternative

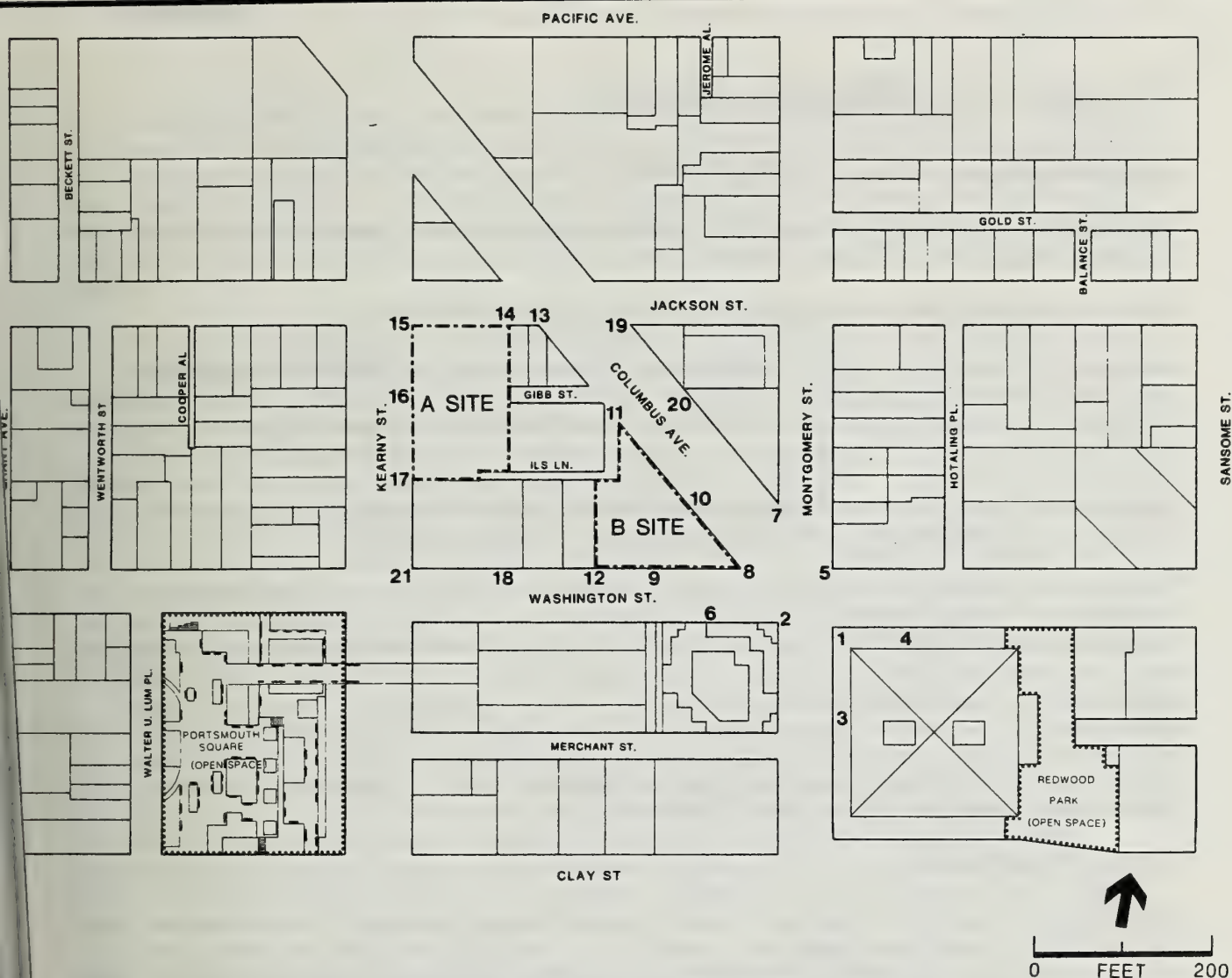
With the Code-Conforming Alternative in place, winds would range from seven to 15 mph and would exceed the comfort criterion at four locations.

Preservation Alternative

The Preservation Alternative would result in wind speeds from eight to 12 mph. Four locations would violate the comfort criterion.

NOTE - Wind Study Methodology

/1/ Equivalent mean wind speed is defined as the mean wind, multiplied by the quantity (1 plus 3 times the turbulence intensity) divided by 1.45.



**WIND SPEEDS (mph) EXCEEDED AT PEDESTRIAN LEVEL
FOR 10% OF TIME**

LOCATION	EXISTING SETTING	PROJECT	CODE- CONFORM	PRESER- VATION
no. 1	9	8	9	9
no. 2	13	12	12	12
no. 3	12	10	10	9
no. 4	12	10	10	9
no. 5	12	10	11	10
no. 6	13	12	13	12
no. 7	9	8	9	9
no. 8	15	10	15	11
no. 9	13	12	13	13
no. 10	7	8	8	8
no. 11	10	8	8	8
no. 12	11	10	10	10
no. 13	7	10	9	10
no. 14	10	8	8	9
no. 15	6	11	10	12
no. 16	7	7	7	8
no. 17	8	11	8	12
no. 18	10	10	8	10
no. 19	8	8	7	8
no. 20	7	9	9	8
no. 21	9	9	7	10

**FIGURE B-1: PAN MAGNA PLAZA
LOCATION OF POSITIONS FOR PEDESTRIAN LEVEL
WIND SPEED MEASUREMENTS**

APPENDIX C: ARCHITECTURAL RESOURCES

ARCHITECTURAL EVALUATION SURVEYS

The architectural ratings discussed in the text of this report represent the results of several separate architectural surveys.

SAN FRANCISCO DEPARTMENT OF CITY PLANNING INVENTORY

Between 1974 and 1976, the San Francisco Department of City Planning conducted a citywide inventory of architecturally significant buildings. An advisory review committee of architects and architectural historians assisted in the final determination of ratings for the 10,000 buildings, the results of which were entered in an unpublished 60-volume record of the inventory. The rated buildings are also represented on a set of color-coded maps which identify the location and relative significance of each building surveyed. The inventory and maps are on file at the Department of City Planning.

The inventory assessed the architectural significance of the surveyed structures from the standpoint of overall design and particular design features. Both contemporary and older buildings were included, but historical associations were not considered. Each building was given two numerical ratings, for architectural quality and for overall architectural significance, urban design context, and environmental significance. The latter rating is referred to in this report. The ratings ranged from a low of "0" to a high of "5". The architectural survey resulted in a listing of the best 10% of San Francisco's buildings. In the estimation of the inventory participants, buildings rated "3" or higher represent approximately the best 2% of the City's architecture.

HERITAGE SURVEY

The Foundation for San Francisco's Architectural Heritage, through its consultants, Charles Hall Page & Associates, Inc., conducted an architectural and historical survey of all downtown structures. In 1979, the original inventory results were published in the book Splendid Survivors (Foundation for San Francisco's Architectural Heritage, Splendid Survivors, California Living Books, San Francisco, 1979). Subsequent Heritage surveys evaluated all structures in the C-3 zoning districts in areas not covered in the Splendid Survivors survey ("San Francisco Downtown Architectural Survey: C-3 Zoning District, Final Evaluated List", December 1, 1982), and structures South of Market and in Chinatown. The expanded inventory has not been formally published by Heritage. Criteria considered in rating the buildings for both surveys include Architectural Significance, Historic Context and Negative Alterations. Summary ratings from "A" to "D" were assigned to each building on the basis of these scores. The summary ratings, as described on pp. 12-13 of Splendid Survivors, are listed below:

- A. "Highest Importance. Individually the most important buildings in downtown San Francisco, distinguished by outstanding qualities of architecture, historical values, and relationship to the environment. All A-group buildings are eligible for the National Register, and of highest priority for City Landmark status."
- B. "Major Importance. Buildings which are of individual importance by virtue of architectural, historical, and environmental criteria. These buildings tend to stand out for their overall quality rather than for any particular outstanding characteristics. B-group buildings are eligible for the National Register, and of secondary priority for City Landmark status."

- The Landmarks Preservation Advisory Board does not distinguish between "A" rated and "B" rated buildings for purposes of preservation. In some instances, Heritage has added a * designation to certain letter ratings (B* for example). The * designation means one of two things, either that if alterations which were made to the building were reversed or removed, the building would be rated higher by Heritage; or if additional information on the building or architect becomes available, then the building would receive a higher rating.

C. "Contextual Importance. Buildings which are distinguished by their scale, materials, compositional treatment, cornice and other features. They provide the setting for more important buildings and they add visual richness and character to the downtown area. Many C-group buildings may be eligible for the National Register as part of historic districts."

D. "Minor or No Importance. Buildings which are insignificant examples of architecture by virtue of original design, or more frequently, insensitive remodeling. This category includes vacant buildings and parking lots. Most D-group buildings are sites of opportunity."

Not Rated. Buildings which have been built or suffered insensitive exterior remodelings since 1945.

● DOWNTOWN PLAN CATEGORIES

The Downtown Plan establishes four categories of architecturally important structures. The Plan states (p. 66) "This Plan proposes a preservation strategy that would require that 244 buildings (called significant buildings in this Plan) be retained, while providing incentives to encourage the retention of other important, but less significant buildings (called contributory buildings). They are shown on Map 12. Both classes of buildings would be entitled to 'Transferable development rights.'

The following material, taken from the Plan, describes the categories and briefly identifies preservation strategies.

Significant Buildings

Those buildings of the highest architectural and environmental importance--buildings whose demolition would constitute an irreplaceable loss to the quality and character of downtown--would be required to be retained. There are 244 of these buildings. They include all buildings rated by Heritage as excellent in either architectural quality or relationship to the environment, or very good in both. (This covers all buildings rated "A" by Heritage and most of the buildings rated "B".)

These buildings--referred to in the Plan as significant buildings--are divided into Category I and Category II, the difference being in the extent of alteration allowed There are 202 significant buildings in Category I ([listed] in Appendix A of Article 11 [of the Code] and 42 significant buildings in Category II listed in Appendix B of Article 11 of the Code.

Contributory Buildings

The Downtown Plan proposes to encourage, but not require, retention of other buildings contributing to the quality and character of downtown. these buildings, called contributory buildings, consist of two groups:

Category III

- Buildings rated very good in architectural quality, but lower than very good in relationship to the environment, or vice versa, and located outside conservation districts. (These buildings were rated "B" by Heritage.) There are 20 of these buildings. They are listed in Appendix C of Article 11 of the Code.

Category IV

- Buildings rated very good in architectural quality, but lower than very good in relationship to the environment or vice versa and which are located in a conservation district. (These buildings were rated "B" by Heritage.)
- Buildings with "contextual value" to a conservation district. These contextual buildings are buildings that themselves are not highly rated in architectural quality and relationship to the environment, but do make a substantial contribution to the "quality" of an area that contains a number of highly rated buildings and that is proposed to be given special protection as a conservation district. (These buildings were rated "C" by Heritage.) The 167 Category IV buildings are listed in Appendix D of Article 11 of the Code.

Six conservation districts are established by the Plan:

Kearny-Market-Mason-Sutter Conservation District

Kearny-Belden Conservation District

New Montgomery-Second Street Conservation District

Commercial-Leidesdorff Conservation District

Front-California Conservation District

Pine-Sansome Conservation District

Generally, the Downtown Plan does not allow transfer of development rights to parcels when such transfer would result in the substantial alteration or demolition of a Significant or Contributory Building.

JACKSON SQUARE HISTORIC DISTRICT SURVEY

The San Francisco Department of City Planning conducted an inventory of 100 buildings in the Jackson Square Historic District in 1978. Buildings were rated on the basis of their importance to the district. Ratings of "Compatible," "Potentially Compatible" or "Incompatible" were assigned to each building.

CHINATOWN SURVEY

The June 1985 evaluation of the architectural, historical and environmental qualities of Chinatown buildings was undertaken in order to establish the proposed boundaries for a Chinatown Historic District. In order to do this, the Department of City Planning classified individual buildings on the basis of their architectural, historic and contextual importance. By establishing a uniform standard of judgment for each building the review panel was able to compare their discrete elements, both internally and in relationship with other buildings. The review included only those buildings rated A, B or C by the Foundation for San Francisco's Architectural Heritage. These buildings are the most important examples of Chinese and Western architecture within the study area.

The designation of Individual or Contextual Importance for each building was arrived at after an evaluation of 13 criteria which examined the building's architecture, history, relationship to environment and integrity.

- A proposal for a Chinatown Historic District was prepared by Patrick McGrew, President of the Landmarks Preservation Advisory Board, in September 1985, and was approved by the LPAB; the proposal is currently before the City Planning Commission. The proposal suggests district boundaries, and includes a statement of significance and ratings of compatibility for individual structures. Factors considered were: materials, details, scale proportion, color, facade treatment and fenestration. Harmony with the surrounding buildings and the district was also weighed. Most of the building in the survey area were deemed compatible.

- NORTH BEACH SURVEY

"North Beach San Francisco: An Architectural, Historical, and Cultural Survey," was prepared by Anne Bloomfield, Daniel Warner and Nancy Olmsted and was sponsored by the North Beach Historical Project, Inc. The survey included a visual survey by foot of 1,100 buildings in North Beach, definition of North Beach as opposed to Russian or Telegraph Hills and an historical account of the both the area and certain structures. This survey did not rank individual structures with a letter or number system; rather it discusses and describes North Beach buildings qualitatively in their architectural, historical and cultural context.

APPENDIX D: TRANSPORTATION

TABLE D-1: PASSENGER LEVELS OF SERVICE ON BUS TRANSIT

<u>Level of Service</u>	<u>Description</u>	<u>Passengers per Seat</u>
A	Level of Service A describes a condition of excellent passenger comfort. Passenger loadings are low with less than half the seats filled. There is little or no restriction on passenger maneuverability. Passenger loading times do not affect scheduled operation.	0.00-0.50
B	Level of Service B is in the range of passenger comfort with moderate passenger loadings. Passengers still have reasonable freedom of movement on the transit vehicle. Passenger loading times do not affect scheduled operations.	0.51-0.75
C	Level of Service C is still in the zone of passenger comfort, but loadings approach seated capacity and passenger maneuverability on the transit vehicle is beginning to be restricted. Relatively satisfactory operating schedules are still obtained as passenger loading times are not excessive.	0.76-1.00
D	Level of Service D approaches uncomfortable passenger conditions with tolerable numbers of standees. Passengers have restricted freedom to move about on the transit vehicle. Conditions can be tolerated for short periods of time. Passenger loadings begin to affect schedule adherence as the restricted freedom of movement for passengers requires longer loading times.	1.01-1.25
E	Level of Service E passenger loadings approach manufacturers' recommended maximums and passenger comfort is at low levels. Freedom to move about is substantially diminished. Passenger loading times increase as mobility of passengers on the transit vehicle decreases. Scheduled operation is difficult to maintain at this level. Bunching of buses tends to occur which can rapidly cause operations to deteriorate.	1.26-1.50
F	Level of Service F describes crush loadings. Passenger comfort and maneuverability is extremely poor. Crush loadings lead to deterioration of scheduled operations through substantially increased loading times.	1.51-1.60

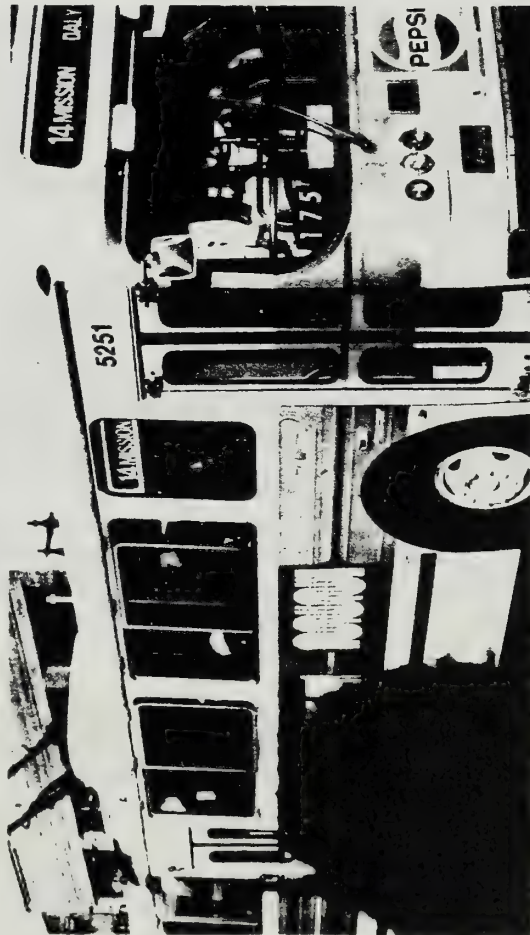
SOURCE: Environmental Science Associates, Inc. from information in Interim Materials on Highway Capacity, Transportation Research Circular 212, pp. 73-113, Transportation Research Board, 1980.



M OCEAN VIEW - CIVIC CENTER STATION
Wednesday, September 9, 1981 - 8:20 A.M. - Inbound



L TARAVAL - VAN NESS STATION
Wednesday, September 16, 1981 - 4:50 P.M. - Outbound



14 MISSION - MISSION STREET AND SOUTH VAN NESS AVE.
Tuesday, September 29, 1981 - 5:45 P.M. - Outbound



N JUDAH - DUBOCE AND CHURCH
Wednesday, June 8, 1983 - 8:00 A.M. Inbound

FIGURE D-1

PHOTOS OF PEAK MUNI LOADING CONDITIONS

SOURCE: ESA



K INGLESIDE - VAN NESS STATION

Wednesday, September 9, 1981 - 8:00 A.M. - Inbound



N JUDAH - VAN NESS STATION

Wednesday, September 16, 1981 - 5:00 P.M. Outbound



38 GEARY - VAN NESS AVE. AND O'FARRELL ST.

Wednesday, October 21, 1981 - 9:00 A.M. - Inbound



38 GEARY - VAN NESS AVE. AND GEARY BLVD.

Wednesday, October 21, 1981 - 4:20 P.M. - Outbound

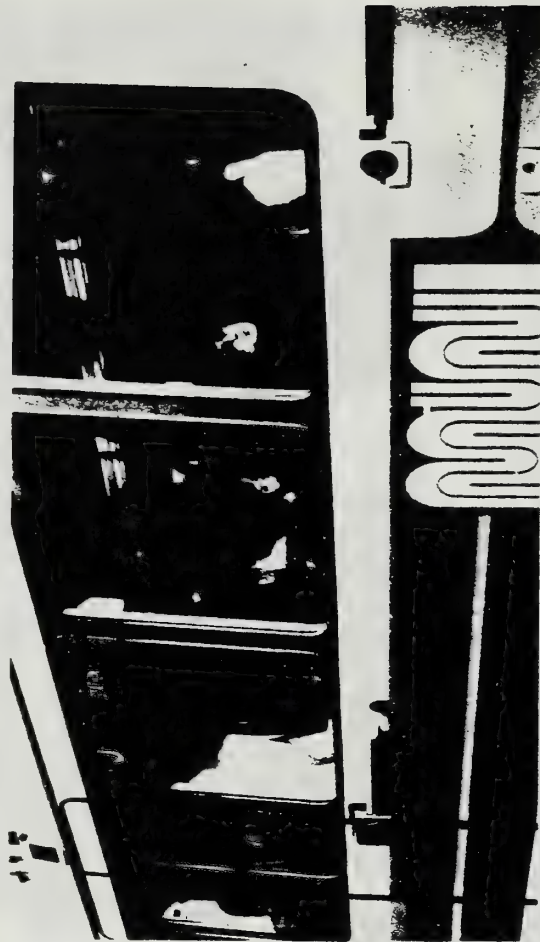
FIGURE D-1 (CONTINUED)

PHOTOS OF PEAK MUNI LOADING CONDITIONS

SOURCE: ESA



30X MARINA EXPRESS - BAYSHORE AVE. AND ARIETA AVE.
Wednesday, October 7, 1981 - 8:00 A.M. - Inbound



J CHURCH - CHURCH ST. AND DUBOCE AVE.
Tuesday, September 29, 1981 - 9:00 A.M. - Inbound

FIGURE D-1 (CONTINUED)
PHOTOS OF PEAK MUNI LOADING CONDITIONS

SOURCE: ESA

PEDESTRIAN ANALYSIS

The pedestrian analysis has been conducted following methods developed by Pushkarev and Zupan in Urban Space for Pedestrians (MIT Press, 1975). Table D-1 shows the relationship between pedestrian flow rates and the flow regimes (categories) used to describe levels of operation. Figure D-1 shows photographs of pedestrian conditions that correspond to the flow regimes.

TABLE D-2: PEDESTRIAN FLOW REGIMEN

<u>Flow Regime/a/</u>	<u>Choice</u>	<u>Conflicts</u>	<u>Flow Rate (p/f/m)/b/</u>
Open	Free Selection	None	less than 0.5
Unimpeded	Some Selection	Minor	0.5 to 2.0
Impeded	Some Selection	High Indirect Interaction	2.1 to 6.0
Constrained	Some Restriction	Multiple	6.1 to 10.0
Crowded	Restricted	High Probability	10.1 to 14.0
<u>Design Limit - Upper Limit of Desirable Flow</u>			
Congested	All Reduced	Frequent	14.1 to 18.0
Jammed	Shuffle Only	Unavoidable	Not applicable/c/

/a/ Photographs of these conditions are shown in Figure D-2.

/b/ p/f/m = Pedestrians per foot of effective sidewalk width per minute.

/c/ For Jammed Flow, the (attempted) flow rate degrades to zero at complete breakdown.

SOURCE: Urban Space for Pedestrians, MIT Press, 1975, Cambridge, MA.

JAMMED FLOW. Space per pedestrian in this view is about 3.8 sq ft (0.35 m²). This is representative of the lower half of the speed-flow curve, where only shuffling movement is possible and even the extremely un-

comfortable maximum flow rate of 25 people per min per ft (82 per m) of walkway width cannot be attained due to lack of space. Photograph by Louis B. Schlivek.



The threshold of **CONGESTED FLOW**. The first eleven people in the view have about 16 sq ft (1.5 m²) per person, corresponding to a flow rate of about 15 people per min per ft (49 per m) of walkway width. The beginnings of congestion are evident in bodily conflicts affecting at least three of the walkers, and in blocked opportunities for walking at a normal pace.



The onset of **CROWDED FLOW**, with an average of about 24 sq ft (2.2 m²) per person, or a flow rate of about 10 people per min per ft (33 per m) of walkway width. Choice of speed is partially restricted, the probability of conflicts is fairly high, passing is difficult. Voluntary groups of two, of which two can be seen in the picture, are maintained, but cause interference. Note also some overflow into the vehicular roadway in the background.



The midpoint of the **CONSTRAINED FLOW** range, with about 30 sq ft (2.8 m²) per person, or a flow rate of about 8 people per min per ft (26 per m) of walkway width. The choice of speed is occasionally restricted, crossing and passing movements are possible, but with interference and with the likelihood of conflicts. The man in the dark suit seems to be able to cross in front of the two women in the foreground quite freely, but in the background near the curb people are having difficulty with passing maneuvers.

FIGURE D-2
PHOTOS OF PEDESTRIAN FLOW LEVELS



The borderline between IMPEDED and UNIMPEDED FLOW, with about 130 sq ft (12 m²) per person, or a flow rate of about 2 people per min per ft (6.5 per m) of walkway width. Individuals as well as couples visible in this view have a choice of speed and direction of movement. This rate of flow is recommended for design of outdoor walkways in office districts and other less dense parts of downtown areas.



The midpoint of the IMPEDED FLOW range, with about 75 sq ft (6.9 m²) per person, or a flow rate of about 4 people per min per ft (13 per m) of walkway width. Physical conflicts are absent, but pedestrian navigation does require constant indirect interaction with others. This rate of flow is recommended as an upper limit for the design of outdoor walkways in shopping districts and other dense parts of downtown areas.



The uneven nature of UNIMPEDED FLOW. While the people walking in the plaza—which is 17 ft (5.2 m) wide, compared to 23 ft (7 m) in the preceding picture—have almost 130 sq ft (12 m²) per person on the average, the space allocation for the eight individuals in the foreground is closer to 70 sq ft (6.4 m²). Thus, indirect interaction with others is still quite frequent in the upper range of UNIMPEDED FLOW.



Lower range of UNIMPEDED movement, approaching OPEN FLOW. About 350 sq ft (32.2 m²) per person, or a flow rate of less than 1 person per min per ft (3.3 per m) of walkway width. Complete freedom to select the speed and direction of movement; individuals behave quite independently of each other. For a design standard based solely on pedestrian density, this amount of space can be considered excessive.

FIGURE D-2 (CONTINUED)
PHOTOS OF PEDESTRIAN FLOW LEVELS

INTERSECTION ANALYSIS

The capacity analysis of each intersection at which a turning movement count was made utilized the "critical lane" method. This method of capacity calculation is a summation of maximum conflicting approach lane volumes that gives the capacity of an intersection in vehicles per hour per lane. (This method is explained in detail in an article entitled "Intersection Capacity Measurement Through Critical Movement Summations: A Planning Tool," by Henry B. McInerney and Stephen G. Peterson, January 1971, Traffic Engineering. This method is also explained in "Interim Materials on Highway Capacity", Transportation Research Circular No. 212, Transportation Research Board, January 1980.) The maximum service volume for Level of Service E was assumed as intersection capacity. A service volume is the maximum number of vehicles that can pass an intersection during a specified time period in which operating conditions are maintained corresponding to the selected and specified Level of Service (see Table D-3). For each intersection analyzed, the existing peak-hour volume was computed and a volume-to-capacity (v/c) ratio calculated by dividing the existing volume by the capacity at Level of Service E.

TABLE D-3: VEHICULAR LEVELS OF SERVICE AT SIGNALIZED INTERSECTIONS

<u>Level of Service</u>	<u>Description</u>	<u>Volume/Capacity (v/c) Ratio/a/</u>
A	Level of Service A describes a condition where the approach to an intersection appears quite open and turning movements are made easily. Little or no delay is experienced. No vehicles wait longer than one red traffic signal indication. The traffic operation can generally be described as excellent.	less than 0.60
B	Level of Service B describes a condition where the approach to an intersection is occasionally fully utilized and some delays may be encountered. Many drivers begin to feel somewhat restricted within groups of vehicles. The traffic operation can generally be described as very good.	0.61-0.70
C	Level of Service C describes a condition where the approach to an intersection is often fully utilized and back-ups may occur behind turning vehicles. Most drivers feel somewhat restricted, but not objectionably so. The driver occasionally may have to wait more than one red traffic signal indication. The traffic operation can generally be described as good.	0.71-0.80
D	Level of Service D describes a condition of increasing restriction causing substantial delays and queues of vehicles on approaches to the intersection during short times within the peak period. However, there are enough signal cycles with lower demand such that queues are periodically cleared, thus preventing excessive back-ups. The traffic operation can generally be described as fair.	0.81-0.90
E	Capacity occurs at Level of Service E. It represents the most vehicles that any particular intersection can accommodate. At capacity there may be long queues of vehicles waiting upstream of the intersection and vehicles may be delayed up to several signal cycles. The traffic operation can generally be described as poor.	0.91-1.00
F	Level of Service F represents a jammed condition. Back-ups from locations downstream or on the cross street may restrict or prevent movement of vehicles out of the approach under consideration. Hence, volumes of vehicles passing through the intersection vary from signal cycle to signal cycle. Because of the jammed condition, this volume would be less than capacity.	1.01+

/a/ Capacity is defined as Level of Service E.

SOURCE: San Francisco Department of Public Works, Traffic Division, Bureau of Engineering from Highway Capacity Manual, Highway Research Board, 1965

TABLE D-4: TRAFFIC LEVELS OF SERVICE FOR FREEWAYS

Level of Service	Description	Volume/Capacity (v/c) Ratio/a/
A	Level of Service A describes a condition of free flow, with low volumes and high speeds. Traffic density is low, with speeds controlled by driver desires, speed limits, and physical roadway conditions. There is little or no restriction in maneuverability due to the presence of other vehicles, and drivers can maintain their desired speeds with little or no delay.	0.00-0.60
B	Level of Service B is in the higher speed range of stable flow, with operating speeds beginning to be restricted somewhat by traffic conditions. Drivers still have reasonable freedom to select their speed and lane of operation. Reductions in speed are not unreasonable, with a low probability of traffic flow being restricted.	0.61-0.70
C	Level of Service C is still in the zone of stable flow, but speeds and maneuverability are more closely controlled by the higher volumes. Most of the drivers are restricted in their freedom to select their own speed, change lanes, or pass. A relatively satisfactory operating speed is still obtained.	0.71-0.80
D	Level of Service D approaches unstable flow, with tolerable operating speeds being maintained though considerably affected by changes in operating conditions. Fluctuations in volume and temporary restrictions to flow may cause substantial drops in operating speeds. Drivers have little freedom to maneuver, and comfort and convenience are low, but conditions can be tolerated for short periods of time.	0.81-0.90
E	Level of Service E cannot be described by speed alone, but represents operations at even lower operating speeds (typically about 30 to 35 mph) than in Level D, with volumes at or near the capacity of the highway. Flow is unstable, and there may be stoppages of momentary duration.	0.91-1.00
F	Level of Service F describes forced flow operation at low speeds (less than 30 mph), in which the freeway acts as storage for queues of vehicles backing up from a restriction downstream. Speeds are reduced substantially and stoppages may occur for short or long periods of time because of downstream congestion. In the extreme, both speed and volume can drop to zero.	1.00+

/a/ Capacity is defined as Level of Service E.

SOURCE: Environmental Science Associates, Inc. from information in the Highway Capacity Manual, Special Report 87, Highway Research Board, 1965.

OFFICE OF THE MAYOR
SAN FRANCISCO



DIANNE FEINSTEIN

July 9, 1984

This is a memorandum of understanding between the Mayor of San Francisco, Four Seas Investment Corporation, and the Citizens Advisory Committee on the International Hotel, regarding development on the International Hotel site. This memorandum is the result of numerous meetings between the Mayor's Office, staff of the Department of City Planning, the Citizens Committee, and Four Seas Investment Corporation.

1. It is understood by all parties that the Four Seas development package consists of two separate 12 story buildings -- one to be constructed on the site known as the International Hotel, at Kearny and Jackson Streets, and the other to be constructed at Columbus and Washington Streets. The conditions listed below shall apply only to the building on the International Hotel site.
2. It is also understood by all parties that this development will comply fully with City Planning codes and regulations.
3. Obligations of the owner, Four Seas Investment Corporation

The 12 story building on the International Hotel site will consist of the following:

- a. The first five (5) floors shall be used for non-residential (commercial and office) uses. And, the upper seven (7) floors shall be used for elderly housing, consisting of 140 units -- 120 of these shall accommodate single persons, the remaining 20 shall accommodate two persons.
- b. The single units shall be approximately 225 net square feet. The double units shall be approximately 325 net square feet.
- c. Each unit shall have self-contained kitchen and bathroom facilities.
- d. Each unit shall be metered individually for electricity.

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e. Rents for all 140 units shall be \$1 per square foot per month exclusive of electricity. Rents shall be fixed for the first five years of the project. After that time, rent increases shall be allowed at a rate equal to 80% of the annual Consumer Price Index (for all consumers in the San Francisco-Oakland metropolitan area as published by the Department of Labor).

f. This rental structure shall remain in place for a period of 40 years.

g. It is intended that vacant units be covered by the above rental structure.

h. Bonafide elderly and disabled tenants living in the International Hotel at the time final eviction notice was served will be given first priority for occupancy in the new housing. It is assumed that not more than thirty (30) such tenants would be interested in moving into the new units.

4. Action by the Mayor

a. The Mayor shall recommend to the Board of Supervisors an allocation of \$1.5 million from the 1985 Community Development Block Grant program for the construction of one floor of elderly housing.

b. The Mayor shall recommend to the Board of Supervisors that the housing portion of the development be assisted through the use of tax exempt bonds issued by the City and County of San Francisco. It is intended that the interest rate on the bonds shall not exceed 10.5%.

c. The Mayor agrees to support the provision of any assistance necessary to assure that such tenants as described in 3h above pay no more than 30% of their income for rent. Cash contribution for this purpose from the City shall not exceed \$40,000.

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5. Obligations of the Citizens Advisory Committee

a. The Citizens Committee shall support the development package as proposed above, and lend such assistance to Four Seas or the City as necessary.

b. The Citizens Committee shall support the allocation of \$1.5 million from the 1985 Community Development Block Grant program for the construction of one floor of elderly housing.



DIANNE FEINSTEIN, MAYOR

DATE 4/9/84



FOUR SEAS INVESTMENT CORPORATION

DATE 4/5/84



CITIZENS ADVISORY COMMITTEE

DATE 7/9/84

APPENDIX F: AIR QUALITY

TABLE F-1: SAN FRANCISCO AIR POLLUTANT SUMMARY, 1981-1984

STATION: 900 23rd Street, San Francisco

POLLUTANT:	STANDARD	1981	1982	1983	1984/i/
OZONE (O³) (Oxidant)					
1-hour concentration, ppm/a/					
Highest hourly average	0.10 /b/ 0.12 /c/	0.07	0.08	0.13	0.10
Number of excesses of state standard		0	0	1	1
Expected Annual Excess (federal)/d/		0.0	0.0	0.3	-
CARBON MONOXIDE (CO)					
1-hour concentration, ppm					
Highest hourly average	20 /b,e/	8	12	7	-
Number of excesses of standard		0	0	0	-
8-hour concentration, ppm					
Highest 8-hour average	9 /b,c/	5.3	9.1	5.1	10.8
Number of excesses of standard		0	1	0	1
TOTAL SUSPENDED PARTICULATE (TSP)					
24-hour concentration, ug/m ³ /a/					
Highest 24-hour average	100 /b,f/	103	126	117	-
Number of excesses of standard/g/		1	3	4	5
Annual concentration, ug/m ³					
Annual Geometric Mean	60 /b,f/	56	57	55	60
Annual excess of standard		No	No	No	Yes
LEAD (Pb)					
30-day concentration, ug/m ³					
Highest 30-day average	1.5 /b/	0.6	0.7	0.4	-
Number of excesses of standard		0	0	0	-
NITROGEN DIOXIDE (NO₂)					
1-hour concentration, ppm					
Highest hourly average	0.25 /b/	0.11	0.13	0.13	0.14
Number of excesses of standard		0	0	0	0
SULFUR DIOXIDE (SO₂)					
24-hour concentration, ppm					
Highest 24-hour average	0.05 /b/	0.016	0.012	0.018	0.03
Number of excesses of standard/g,h/		0	0	0	0

/a/ ppm: parts per million. ug/m³: micrograms per cubic meter.

/b/ State standard, not to be equaled or exceeded, except for CO standards, which are not to be exceeded.

(Continued)

TABLE F-1: SAN FRANCISCO AIR POLLUTANT SUMMARY 1981-1984 (Continued)

- /c/ Federal standard, not to be exceeded more than once per year, except for annual standards, which are not to be exceeded.
- /d/ Expected Annual Excess is a three-year average of annual excesses of the federal standard.
- /e/ The state one-hour CO standard was revised from 35 ppm to 20 ppm in January 1983. The federal one-hour standard remains 35 ppm.
- /f/ The California ARB has redefined the state particulate standard to apply to "inhalable" particulates only (i.e., those which have a diameter less than ten microns). The new standards are 50 ug/m³ for 24-hour averages and 30 ug/m³ for the annual geometric mean. No data is currently available on the particle size distribution of the TSP sampled at the San Francisco monitoring station.
- /g/ Number of observed excess days (measurements taken once every six days).
- /h/ Exceeding the SO₂ standard is a violation only if a concurrent excess of the state ozone or TSP standards occurs at the same station. Otherwise, the federal standard of 0.14 ppm applies.
- /i/ 1981-1984 data collected at 900 23rd Street

SOURCE: BAAQMD, 1981 - 1983, Air Quality in the San Francisco Bay Area; and California ARB, 1981 - 1984, California Air Quality Data.
